

GREENBERG TRAUIG, LLP
MATHEW S. ROSENGART (SBN 255750) (*RosengartM@gtlaw.com*)
SCOTT D. BERTZYK (SBN 116449) (*Bertzys@gtlaw.com*)
LISA C. MCCURDY (SBN 228755) (*McCurdyL@gtlaw.com*)
KYLE R. FREENY (SBN 247857) (*FreenyK@gtlaw.com*)
1840 Century Park East, Suite 1900
Los Angeles, CA 90067-2121
Tel: 310-586-3889
Fax: 310-586-7800

Attorneys for Britney Jean Spears

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL DISTRICT

In re the Conservatorship of the Person and
Estate of BRITNEY JEAN SPEARS

Case No. BP108870

Hon. Brenda J. Penny, Dept. 4

**DECLARATION OF MATHEW S.
ROSENGART IN SUPPORT OF BRITNEY
JEAN SPEARS'S OPPOSITION TO JAMES P.
SPEARS'S MOTION TO COMPEL**

Date: July 13, 2022
Time: 1:30 PM
Dept: 4

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I, Mathew S. Rosengart, declare and affirm as follows:

1. I am a shareholder with the law firm Greenberg Traurig, LLP, admitted to practice before this Court and counsel on this matter for Britney Jean Spears. I have personal knowledge of the facts stated herein, and if called and sworn as a witness, I could testify competently thereto.

2. I participated in a telephonic meet and confer teleconference with counsel for James P. Spears on May 23, 2022. Attached hereto as **Exhibit 1** is a true and correct copy of an excerpt of the transcript of this telephonic meet and confer teleconference.

3. Attached hereto as **Exhibit 2** are true and correct copies of Ms. Spears's amended discovery responses, served on June 14, 2022 in response to discovery requests propounded by James P. Spears in this action.

4. Attached hereto as **Exhibit 3** is a true and correct copy of Ms. Spears's Motion to Compel Deposition of James P. Spears, filed in this action on May 25, 2022.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 28th day of June, 2022.

By: /s/ Mathew S. Rosengart

Exhibit 1

SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES - CENTRAL DISTRICT

In re the Conservatorship of the) Case No. BP108870
Person and Estate of)

BRITNEY JEAN SPEARS,

Conservatee.

REPORTER'S TRANSCRIPT OF PROCEEDINGS

MEET-AND-CONFER CALL

Monday, May 23, 2022

REPORTED BY:

JANET MURPHY
CSR No. 9650

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SUPERIOR COURT OF CALIFORNIA

COUNTY OF LOS ANGELES - CENTRAL DISTRICT

In re the Conservatorship of the)	Case No. BP108870
Person and Estate of)	
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BRITNEY JEAN SPEARS,)	
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Conservatee.)	
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Reporter's Transcript of Proceedings of the
Meet-and-Confer Call between Counsel held
telephonically on Monday, May 23, 2022,
commencing at 3:03 p.m., reported by
Janet Murphy, Certified Shorthand Reporter
of the State of California, CSR No. 9650

1 APPEARANCES OF COUNSEL:

2
3 FOR THE CONSERVATEE
4 BRITNEY JEAN SPEARS:

5 GREENBERG TRAURIG, LLP
6 BY: MATHEW S. ROSENGART, ESQ.
7 LISA C. MCCURDY, ESQ.
8 1840 Century Park East
9 Suite 1900
10 Los Angeles, California 90067
11 (310) 586-7700 / FAX (310) 586-7800
12 E-mail: rosengartm@gtlaw.com
13 mccurdyl@gtlaw.com

14
15 GREENBERG TRAURIG, LLP
16 BY: KYLE R. FREENY, ESQ.
17 2101 L Street, N.W.
18 Suite 1000
19 Washington, D.C. 20037
20 (202) 331-3100
21 E-mail: freenyk@gtlaw.com

22
23 FOR THE FORMER CONSERVATOR OF THE ESTATE
24 JAMES P. SPEARS:

25 WILLKIE FARR & GALLAGHER LLP
BY: ALEX M. WEINGARTEN, ESQ.
ERIC J. BAKEWELL, ESQ.
SEAN P. HANLE, ESQ.
EMILY HORAK, ESQ.
2029 Century Park East
Suite 3400
Los Angeles, California 90067
(310) 855-3000 / FAX (310) 855-3099
E-mail: aweingarten@willkie.com
ebakewell@willkie.com
shanle@willkie.com
ehorak@willkie.com

1 would make sense to push back any motion to compel
2 deadline, we can discuss that at that time. It's
3 probably premature to do it right now, but we think that
4 that would make sense.

5 With regard to the deposition issue, we also
6 think, for the reasons laid out in our letter of
7 March 2nd, that it really makes sense, until you get our
8 amended or supplemental responses, to wait before
9 addressing that issue.

10 I can just tell you that we obviously take
11 very strong issue with, of course, a number of
12 characterizations in your May 6th letter, including, most
13 notably, that our client is obligated to, at deposition,
14 respond to questions concerning what you, we believe
15 incorrectly, refer to as "her" allegations.

16 The allegations at issue, which are summarized
17 in our January 14th filings, are not the allegations of
18 Britney Spears. I think it's really important to hit the
19 "reset" button and discuss context for a second, because
20 your letter does correctly refer to allegations of
21 misconduct; but it is incorrect, again, that those are
22 the allegations of Britney Spears.

23 The key allegation or one of the key allegations
24 concerns whether or not Mr. Spears had knowledge of, was
25 involved in, or directed an illicit surveillance or

1 spying operation on Britney Spears; specifically whether
2 he intercepted or was monitoring or recording texts
3 and other communications from cell phones used by
4 Britney Spears and/or to what extent he was involved in
5 the placement of an illicit surveillance device or
6 recording device or bug in her bedroom.

7 Those are not allegations, contrary to what's
8 stated in your letter, that were made directly by
9 Britney Spears. Those are allegations that were made by
10 a whistleblower, formerly employed by Black Box Security,
11 as corroborated by "The New York Times" in its
12 September 24, 2021 article.

13 Relatedly, the allegations at issue of
14 Mr. Spears's misconduct include his actual or apparent or
15 potential conflict of interest in violation of, among
16 other things, California Rule of Court 7.1059.

17 That is not an allegation made by
18 Britney Spears. That is an allegation, which is factual,
19 that we learned about when you confirmed to "The New York
20 Times" that Tri Star loaned money to Jamie Spears and, as
21 of the time of the conservatorship, Jamie Spears owed
22 Tri Star Sports and Entertainment at least \$40,000.

23 We believe that's an actual and apparent
24 conflict of interest. And, again, contrary to your
25 meet-and-confer letter, that is not an allegation made

1 by Britney Spears. It's a fact, but it's not an
2 allegation that comes from her; and therefore, that's
3 not something that she should be subjected to a
4 deposition on.

5 Again, I'll circle back and state that we will,
6 in response to your written discovery requests, address
7 that issue and several of the others here.

8 Another allegation concerns whether or not
9 Jamie Spears's severe alcoholism affected his
10 administration of the conservatorship. That's something
11 that Jamie Spears is in the best position to testify
12 about.

13 Another allegation concerns how much money
14 Jamie Spears took from the estate. We know that he took
15 at least 6.3 million dollars from the estate, according
16 to QuickBooks accounting data that we obtained.

17 That's not something that's within the
18 knowledge of Britney Spears, who, after all, was in a
19 conservatorship at this time, as we obviously all know.

20 This is just not a classic case of a witness, an
21 ordinary witness having relevant information that he or
22 she should be deposed upon, given the unique fact that
23 she was in a conservatorship for 13 years. And again,
24 these are not her allegations. This is not information
25 that she has.

1 Jamie Spears is the one who knows how much money
2 he took, properly or improperly, from the estate.

3 Jamie Spears is the person who knows how much he
4 paid Tri Star, properly or improperly, from the estate.

5 Jamie Spears is the person who knows how much he
6 paid Black Box Security, properly or improperly, from the
7 estate.

8 Jamie Spears, not Britney Spears, is the person
9 who knows whether or not he disclosed the spying
10 operation to the Court at the time he submitted the
11 accountings to the Court.

12 So those are also not allegations made by
13 Britney Spears.

14 Jamie Spears is the one who can testify in
15 regard to why he approved the \$500,000 payment to
16 Tri Star after Britney Spears went on hiatus.

17 Jamie Spears is the one who must and can testify
18 as to why he approved Lou Taylor's personal legal fees in
19 connection with the Bryan Kuchar litigation.

20 Again, that's not an allegation made by
21 Britney Spears. That was an accusation initially made in
22 the November 20, 2020 objections that were filed by her
23 prior counsel.

24 So we can continue to go down the laundry list,
25 but the point being, we will be, again, amending our

1 written objections; but it's misplaced and a false
2 premise to say that Britney Spears is making the
3 allegations or has made the allegations that are at the
4 heart of discovery and that are at the heart of the
5 hearings that are going to occur on July 13, July 20, and
6 July 27, to the extent they go forward.

7 And I think we should have a conversation about
8 that, because it's questionable whether they will go
9 forward on that date. Maybe they will, maybe they won't.
10 That's a separate discussion.

11 Another allegation -- and this is the last one
12 I'll mention; they're set forth in our January 14th
13 filings -- but another allegation, not made by
14 Britney Spears, but an allegation that came up during
15 discovery and during our investigation, is why
16 Jamie Spears spent more than one million dollars on
17 expenses on the Louisiana residence, including a
18 substantial amount to his son-in-law's company.

19 That's an allegation that was actually raised by
20 the Court during one of the hearings predating my law
21 firm's involvement in this case. It's not an allegation
22 that was made by Britney Spears.

23 So the thrust of your letter is that our client,
24 who was in a conservatorship and kept in the dark about
25 just about everything, has made allegations that she

1 needs to testify about. And we just believe that's a
2 completely incorrect premise for the reasons we
3 articulated; and we believe that's going to be even more
4 clear when we provide our written objections, which,
5 again, we'll do within 30 days from today.

6 There is one other thing that --

7 MR. WEINGARTEN: I just want to make sure that --

8 MR. ROSENGART: I'm sorry. Go ahead.

9 MR. WEINGARTEN: No, go. I was confirming that you
10 were done. You're not, so please continue.

11 MR. ROSENGART: I'm probably not done, but I'm done
12 for the moment, if you want to interject.

13 MR. WEINGARTEN: No. Go ahead with what you were
14 saying. That's fine. I'll respond to it all at once.

15 MR. ROSENGART: The other thing that I was going to
16 say -- and there's more to say; I'll stop after this --
17 is there's written discovery that has gone back and forth
18 on both sides. We can engage in motion practice on this
19 issue.

20 One thing we wanted to put on the table, which
21 we think makes sense as a practical matter, would be an
22 informal discovery conference on the written discovery
23 issues before Judge Penny.

24 MR. WEINGARTEN: I'm sorry. So I don't believe that
25 Judge Penny has an established IDC procedure, if what

REPORTER'S CERTIFICATE


I, the undersigned, a Certified Shorthand Reporter of the State of California, do hereby certify:

That the foregoing proceedings were taken before me at the time and place herein set forth; that a record of the proceedings was made by me using machine shorthand which was thereafter transcribed under my direction; that the foregoing transcript is a true record of the proceedings held.

I further certify I am neither counsel for, nor related to, any party to said action, nor am I interested in the outcome thereof.

In witness whereof, I have this date subscribed my name.

Dated: May 31, 2022



JANET MURPHY, CSR NO. 9650

Exhibit 2

Amended Responses to Form
Interrogatories

GREENBERG TRAUIG, LLP

MATHEW S. ROSENGART (SBN 255750) (*RosengartM@gtlaw.com*)

SCOTT D. BERTZYK (SBN 116449) (*BertzkyS@gtlaw.com*)

LISA C. MCCURDY (SBN 228755) (*McCurdyL@gtlaw.com*)

MATTHEW R. GERSHMAN (SBN 253031) (*GershmanM@gtlaw.com*)

1840 Century Park East, Suite 1900

Los Angeles, CA 90067-2121

Tel: 310-586-7700

Fax: 310-586-7800

Attorneys for Britney Jean Spears

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES, CENTRAL DISTRICT

In re the Conservatorship of the Person and
Estate of BRITNEY JEAN SPEARS

Case No. BP108870

Hon. Brenda J. Penny, Dept. 4

**BRITNEY JEAN SPEARS'S FIRST
AMENDED RESPONSES TO FIRST SET
OF FORM INTERROGATORIES FROM
JAMES P. SPEARS**

ASKING PARTY: James P. Spears

ANSWERING PARTY: Britney Jean Spears

SET NO.: ONE

1 Britney Jean Spears (“Responding Party”) provides these amended responses and objections to
2 James P. Spears’s First Set of Form Interrogatories as follows:

3 **PRELIMINARY STATEMENT**

4 On July 26, 2021, Britney Spears, through the undersigned counsel, filed her Verified Petition
5 for Suspension and Removal of James P. Spears as Conservator of the Estate. After extensive briefing
6 and argument and a lengthy hearing, on September 29, 2021, the Court suspended James P. Spears,
7 determining that the conservatorship he had run was “toxic” and that the suspension of Mr. Spears was
8 proper and in the best interests of the conservatee. Thus, after enduring a 13-plus year conservatorship,
9 from which Mr. Spears enriched himself by reaping at least \$6 million in salary, fees, and
10 commissions—even though he was not a talent representative, but was instead supposed to have been
11 serving as a fiduciary—Britney Spears was set free. Regrettably, rather than letting her live her life and
12 moving on, Mr. Spears has nevertheless continued to importune, seeking to harass and bully his
13 daughter, including in connection with improper, abusive discovery involving *145 document requests*
14 *alone*.

15 Mr. Spears expressly placed his misconduct at issue in his December 15, 2021 fee petition, and
16 all of the facts surrounding his misconduct are within his possession, custody, and control. This is not a
17 game, and he should stop treating it like one. He should fulfill his final fiduciary duties, act like a
18 fiduciary (if not a decent father), and move on. What is all the more disgraceful is that Mr. Spears has
19 failed to search for or produce any text messages concerning his patent and potentially-criminal
20 misconduct (which he placed directly at issue in this case); has failed to comply with his written
21 discovery obligations (instead issuing boilerplate, blanket objections); and has inexcusably evaded his
22 deposition for eight months—even as he falsely claimed he “has nothing to hide” and would therefore
23 “hide nothing” and that he would act with “unconditional” cooperation and transparency.

24 Although he has repeatedly and discordantly referred to himself as a “loving father”—indeed, he
25 and his counsel spent substantial conservatorship funds (*Britney Spears’s funds*) on a media tour to try,
26 with futility, to convey such an image—the evidence of abuses endured by Ms. Spears under the
27 conservatorship imposed by her father and kept in place for well over a decade, is manifest. He knows
28 this. The abusive discovery he purports to have propounded further proves this point.

1 While enriching himself from the conservatorship, making himself a multi-millionaire at his
2 daughter's expense on the heels of his admitted alcohol abuse, lack of a career, and long history of
3 financial mismanagement, including tax liens, mortgage defaults, failed business ventures, and a
4 Chapter 7 bankruptcy, Mr. Spears stripped his daughter of fundamental liberties, worked his daughter to
5 the point of exhaustion, and ran a toxic conservatorship that was borne of, and seriously tainted by,
6 significant conflicts of interest in violation of, among other things, the California Rules of Court. *See*
7 Cal. R. Ct. No. 7.1059, *et seq.* ("Standards of conduct for the conservator of the estate").

8 By way of brief illustration only, Mr. Spears admittedly borrowed substantial monies from Tri
9 Star Sports & Entertainment ("Tri Star") shortly before placing his daughter into the conservatorship
10 and then (despite her supposed incapacity), he sent her on a grueling 97-show international tour and
11 onto other work from which he and others obtained millions of dollars. As Anthony Palmieri, President
12 of the National Guardianship Association, an organization representing conservators, recently stated,
13 "[t]he existence of the Tri Star loan . . . is troubling." "It makes me wonder where the allegiance lies. Is
14 the conservator making decisions in the best interest of the conservatee or the business manager who
15 they owe a debt to? ***It reeks of conflict of interest***" (emphasis added).¹ *See also* California Rules of
16 Court governing conservators, Cal. R. Ct. No. 7.1059(a) ("The conservator must avoid actual conflicts
17 of interest and, consistent with his or her fiduciary duty to the conservatee, the appearance of conflicts
18 of interest." Further, "[t]he conservator must avoid any personal, business, or professional interest or
19 relationship that is or reasonably could be perceived as being self-serving or adverse to the best interest
20 of the conservatee"); Cal. R. Ct. No. 7.1059(a) (2)-(4); 7.1059(b).

21 Additionally, as described in *The New York Times*' extensive, detailed reporting, and as further
22 corroborated by ex-FBI Special Agent Sherine Ebadi, Mr. Spears directed or was involved in an intense
23 surveillance operation of his own daughter, which reportedly included placing a secret listening device
24 in her private bedroom and capturing (***in real time and contemporaneously***) her private
25 communications, ***including sacrosanct, privileged communications with her counsel***. In addition to
26 these gross invasions of privacy, as the record demonstrates, Mr. Spears (while acting as Conservator),
27

28 ¹ *See* Liz Day, Emily Steel, Rachel Abrams, and Samantha Stark, *Britney Spears Felt Trapped. Her Business Manager Benefited*, *The New York Times* (Dec. 19, 2021), <https://www.nytimes.com/2021/12/19/business/britney-spears-conservatorship-tri-star.html>.

1 engaged in self-dealing, diversion of conservatorship resources, and misuse of his daughter's funds.
2 During his tenure serving as Conservator, Mr. Spears was also subjected to a Domestic Violence
3 Restraining Order, resulting from allegations of harassment or abuse of his own daughter's child or
4 children.²

5 Although Mr. Spears's breaches of fiduciary duties and other misconduct are obvious, he has
6 repeatedly, falsely claimed that he has "nothing to hide," will "hide nothing," and will "unconditionally
7 cooperate" with counsel, with "complete transparency without conditions."³ He continues to hide and
8 obstruct, however. Among other things, Mr. Spears has now failed no less than three times to appear for
9 his deposition. He has also failed, for numerous months, to answer fundamental questions concerning,
10 among other things, (i) his role in eavesdropping on his daughter, including contemporaneously
11 capturing his daughter's text communications (*including with her attorney*) and the placement of a
12 secret listening device in her private bedroom; (ii) the total fees taken or received by James P. Spears (or
13 any entity in which he had any interest) from Britney Spears or her Estate; (iii) why Ms. Spears's net
14 worth was so "shockingly low" relative to her gross earnings of hundreds of millions of dollars during
15 the past decade, *see Britney Spears' Net Worth Revealed—And It's Shockingly Low Compared to Her*
16 *Pop Peers, Forbes*, Feb. 17, 2021; (iv) all corporate formation documents for all entities created for the
17 purported benefit of Britney Spears or her Estate; and (v) other economic and related questions
18 concerning how Mr. Spears administered the conservatorship he imposed in 2008.

19 Rather than answering these questions and cooperating with Ms. Spears's efforts to obtain
20 relevant, fundamental truthful information and answering questions under oath at deposition, which he
21 is bound to do as a fiduciary (and which he would be obligated to do even if he were *not* a fiduciary), as
22 referenced above, Mr. Spears has harassed and bullied his daughter. By way of illustration, in October
23 2021, Mr. Spears baldly objected to every single discovery request propounded by Ms. Spears. Further,
24 even as he has incongruously failed to appear for deposition or produce documents and information in a

25 ² Instead of seeking to place her into an LPS conservatorship with a higher burden and a statutory framework that presumes
26 that the conservatee's mental health can improve and contains stringent requirements and protections for the conservatee,
27 Mr. Spears placed his daughter into a long-term probate conservatorship generally intended for those with "dementia," whose
28 situations cannot or most likely will not improve, without filing a declaration of incapacity.

³ *See* James P. Spears's November 1, 2021 "Status Report." Pursuant to applicable caselaw, Mr. Spears himself will be
responsible for all legal costs and fees he incurs in connection with these matters.

1 timely, organized, Bates labeled, and professional manner (including those that are no longer privileged,
2 post-his September 29, 2021, suspension pursuant to the *Moeller* and *Stine* cases, because the privilege
3 rests not with Mr. Spears, but with the Estate), Mr. Spears has purported to serve on his daughter **145**
4 document requests alone, as well as more than 75 other discovery requests.

5 Mr. Spears's tactics of trying to intimidate, harass, and bully his daughter (even after he was
6 ignominiously suspended by the Court as her Conservator) must cease. Relatedly, his unduly
7 burdensome, irrelevant, and oppressive "discovery" is improper and objectionable for the reasons set
8 forth herein; but as an overriding matter, it is **uniquely** improper and objectionable because Mr. Spears
9 stripped his daughter of civil liberties and grossly invaded her privacy for 13 years. Now that he has
10 been suspended and the conservatorship terminated, his efforts to misuse discovery to even further
11 invade his daughter's privacy simply cannot be countenanced.

12 Even putting this aside, however, perhaps most abusively, and improperly, Mr. Spears has
13 outrageously used his daughter as a pawn, seeking to barter his deposition for hers. Mr. Spears must
14 know (or certainly should know) that any such deposition would be abjectly pointless insofar as this
15 litigation (which **he** commenced) concerns the acts and omissions of Mr. Spears and, thus, all relevant
16 information is uniquely within his possession, custody, and control. Indeed, this unavoidable truth has
17 been discussed at length in meet and confer discussions between counsel; as to Mr. Spears's professed
18 right to inquire into Britney Spears's "claims," Ms. Spears' counsel has made clear time and again that
19 the "claims" to which Mr. Spears refers are not claims of Britney Spears. Instead, those topics flow
20 from the privileged investigation of former FBI Special Agent Sherine Ebadi, the accounts of a former
21 Black Box Security employee and whistleblower, Alex Vlasov, *The New York Times*, and other sources
22 and parties that are *not* Britney Spears. Revealing the true nature of Mr. Spears's desire to depose
23 Britney Spears, Mr. Spears's counsel, in a January 26, 2022 email, expressed Mr. Spears's interest in
24 questioning his daughter regarding "child safety . . . and [possible] drug use," and took the incredible
25 and despicable step of leaking that objective (not a pleading, not a public filing, but an email with that
26 objective) to the press, all to serve his diabolical "strategy" of upsetting his daughter.

27 Thus, two things are true: (1) it is evident that Mr. Spears has no shame and will continue his
28 campaign to intimidate and harass his own daughter, including by his efforts to make her sit for a

1 deposition that would have no object other than to harass and upset her (he hopes); and (2) his written
2 discovery served on Ms. Spears is misplaced, targeting “allegations” that are not allegations of Britney
3 Spears and about which there is no legitimate, good faith basis to question her here. Nonetheless,
4 following meet and confer discussions, while reserving all rights, and solely in an effort to avoid
5 unnecessary and costly motion practice, these amended responses are being served. These amended
6 responses do not imply any obligation to provide information and documents in the possession, custody
7 and control of others. Instead, these amended responses demonstrate that there is no legitimate basis for
8 Mr. Spears to pursue his daughter’s deposition. (*See City of King City v. Community Bank of Central*
9 *California*, 131 Cal. App. 4th 913, 933 (2005) (the inquiry focuses on “whether discovery would
10 produce additional admissible evidence”) (emphasis in original); *see also Calcor Space Facility, Inc. v.*
11 *Superior Court*, 53 Cal. App. 4th 216, 223 (1997) (observing that discovery abuse is a “cancer [that] is
12 spreading,” and that, accordingly, judges must be aggressive in curbing it and insisting that discovery be
13 used properly and not as a tactic for improper purposes); *Rifkind v. Superior Court*, 22 Cal. App. 4th
14 1255 (1994) (“If the deposing party ... wants to know what the adverse party is contending, or how it
15 rationalizes the facts a supporting a contention, it may ask that question in an interrogatory”); *Estate of*
16 *Ruchti*, 12 Cal. App. 4th 1593, 1602 (1993) (“other discovery devices less intrusive to the attorney/client
17 privilege and work product protection, such as interrogatories, would have been appropriate”); *Pacific*
18 *Architects Collaborative v. State of Cal.*, 100 Cal. App. 3d 110, 126-127 (1979) (deposition not
19 appropriate where subject matter was not relevant to issues at hand).)

20 * * *

21 The following amended responses and objections are based only upon information presently
22 available to and specifically known by Responding Party. Facts and evidence now known may be
23 imperfectly understood. Additionally, discovery is ongoing in this matter. Accordingly, Responding
24 Party reserves the right to further modify or amend these responses on the basis of subsequently
25 acquired knowledge, information, or understanding. These responses reflect the information that is
26 presently available to Responding Party as derived from such investigation as was possible prior to the
27 date of these responses. Responding Party expressly reserves the right to further amend, add to, delete
28 from, or otherwise modify or supplement each response, to produce documents and/or to make such

claims and contentions as may be appropriate when Responding Party has concluded discovery and has ascertained more relevant facts. Except for facts expressly admitted, if any, no incidental or implied admissions are intended or should be construed from any response. The fact that Responding Party provides a response to part or all of any interrogatory is not intended and shall not be construed to be a waiver by Responding Party of all or any part of any objection to such interrogatory. Responding Party's responses are made without waiver of the following rights, and, on the contrary, are intended to preserve and do preserve the following:

(i) the right to raise all questions of authenticity, foundation, relevancy, materiality, privilege, and admissibility as evidence for any purpose of the information identified in response to the interrogatories which may arise in any subsequent proceedings in, or trial, if any, of, this or any other action;

(ii) the right to object on any ground to the use of said information identified in response to the interrogatories in any subsequent proceeding in, or hearing of, this or any other action;

(iii) the right to object on any ground to the introduction into evidence of information identified in response to the interrogatories;

(iv) the right to object on any ground at any time to other discovery involving the information provided; and

(v) the right to further amend or supplement these responses in the event that any information is unintentionally omitted. Inadvertent identification or production of privileged documents or information by Responding Party is not a waiver of any applicable privilege.

This Preliminary Statement is incorporated into each response set forth below.

GENERAL OBJECTIONS

1. Responding Party objects to each interrogatory to the extent it invades the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege or immunity.

2. Responding Party objects to each interrogatory to the extent it is vague, ambiguous, overbroad, unduly burdensome, oppressive, irrelevant, or not proportional to the needs of the case.

1 3. Responding Party objects to each interrogatory to the extent it seeks information and/or
2 the identification or production of documents not within Responding Party's possession, custody, or
3 control.

4 4. Responding Party objects to each interrogatory to the extent it attempts or purports to
5 impose obligations beyond those created by the Code of Civil Procedure or to provide a response for or
6 on behalf of any other person or entity.

7 5. Responding Party objects to each interrogatory to the extent it seeks information and/or
8 the identification or production of documents which are publicly available and/or uniquely or equally
9 available to James P. Spears.

10 6. Responding Party objects to each interrogatory to the extent that it calls for the
11 production of proprietary, trade secret, and/or commercially sensitive information, or the personal or
12 confidential information of third parties.

13 7. Responding Party objects to each interrogatory to the extent it seeks information based
14 on electronically stored information (ESI), the recovery or restoration of which is unduly burdensome
15 and expensive.

16 8. Responding Party objects to each interrogatory to the extent the discovery sought is not
17 relevant to any matters before the court, nor reasonably calculated to lead to the discovery of admissible
18 evidence regarding those matters.

19 9. Responding Party objects to each interrogatory to the extent the timeframe at issue in the
20 interrogatories is vague, ambiguous and/or unduly burdensome.

21 These General Objections are incorporated into each response set forth below.

22 **RESPONSES TO FORM INTERROGATORIES**

23 **INTERROGATORY NO. 1.1:**

24 State the name, **ADDRESS**, telephone number, and relationship to you of each **PERSON** who
25 prepared or assisted in the preparation of the responses to these interrogatories. (*Do not identify anyone*
26 *who simply typed or reproduced the responses.*)
27
28

1 **RESPONSE TO INTERROGATORY NO. 1.1:**

2 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
3 in full. Further:

4 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
5 attorney-privileged communications or attorney work-product.

6 Responding Party objects to this interrogatory on the grounds that it is oppressive and seeks
7 documents or information that are neither relevant nor reasonably calculated to lead to the discovery of
8 admissible evidence.

9 **AMENDED RESPONSE TO INTERROGATORY NO. 1.1:**

10 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
11 in full. Further:

12 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
13 attorney-privileged communications or attorney work-product.

14 Responding Party objects to this interrogatory on the grounds that it is oppressive and seeks
15 documents or information that are neither relevant nor reasonably calculated to lead to the discovery of
16 admissible evidence.

17 Subject to the Preliminary Statement and General Objections, each of which is incorporated
18 herein as though set forth in full, and the foregoing, Responding Party identifies her counsel of record in
19 this action.

20 **INTERROGATORY NO. 2.1:**

21 State:

- 22 (a) your name;
23 (b) every name you have used in the past; and
24 (c) the dates you used each name.

25 **RESPONSE TO INTERROGATORY NO. 2.1:**

26 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
27 in full. Further:
28

1 Responding Party objects that the interrogatory is overbroad, unduly burdensome, and
2 oppressive, including because it seeks information equally available to James P. Spears.

3 Responding Party objects to this interrogatory on the grounds that it is oppressive and seeks
4 documents or information that are neither relevant nor reasonably calculated to lead to the discovery of
5 admissible evidence.

6 **AMENDED RESPONSE TO INTERROGATORY NO. 2.1:**

7 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
8 in full. Further:

9 Responding Party objects that the interrogatory is overbroad, unduly burdensome, and
10 oppressive, including because it seeks information equally available to James P. Spears.

11 Responding Party objects to this interrogatory on the grounds that it is oppressive and seeks
12 documents or information that are neither relevant nor reasonably calculated to lead to the discovery of
13 admissible evidence.

14 Subject to the Preliminary Statement and General Objections, each of which is incorporated
15 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

16 Responding Party's name is Britney Jean Spears.

17 **INTERROGATORY NO. 12.3:**

18 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** obtained a written or recorded
19 statement from any individual concerning the **INCIDENT**? If so, for each statement state:

20 (a) the name, **ADDRESS**, and telephone number of the individual from whom the statement
21 was obtained;

22 (b) the name, **ADDRESS**, and telephone number of the individual who obtained the
23 statement;

24 (c) the date the statement was obtained; and

25 (d) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original
26 statement or a copy.

1 **INTERROGATORY NO. 17.1:**

2 Is your response to the interrogatory for admission served with these interrogatories an
3 unqualified admission? If not, for each response that is not an unqualified admission:

- 4 (a) state the number of the request;
- 5 (b) state all facts upon which you base your response;
- 6 (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have
7 knowledge of those facts; and
- 8 (d) identify all **DOCUMENTS** and other tangible things that support your response and state
9 the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

10 **RESPONSE TO INTERROGATORY NO. 17.1:**

11 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
12 in full. Further:

13 Responding Party incorporates its objections to the First Set of Requests for Admission,
14 including Preliminary Statement, General Objections, and objections to each individual Request for
15 Admission as if set forth herein in full.

16 Responding Party objects to this interrogatory to the extent it seeks confidential or private
17 information, private financial information, confidential business or commercial information, trade
18 secrets, proprietary information, or otherwise calls for information protected by Responding Party's
19 right of privacy.

20 Responding Party objects to the interrogatory to the extent it seeks private and confidential
21 information of third parties who are not parties to this lawsuit, and without any notice to said parties.

22 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
23 attorney-privileged communications or attorney work-product.

24 Responding Party objects to this interrogatory on the grounds that it seeks documents or
25 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
26 evidence.

27 Responding Party objects to this interrogatory as overbroad, unduly burdensome and expensive,
28 harassing, duplicative, oppressive, and for the purpose of creating unneeded expense.

1 Responding Party objects that the interrogatory seeks a legal conclusion or opinion.

2 Responding Party objects to this interrogatory as premature to the extent it seeks expert opinions
3 or testimony.

4 **AMENDED RESPONSE TO INTERROGATORY NO. 17.1:**

5 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
6 in full. Further:

7 Responding Party incorporates its objections to the First Set of Requests for Admission,
8 including Preliminary Statement, General Objections, and objections to each individual Request for
9 Admission as if set forth herein in full.

10 Responding Party objects to this interrogatory to the extent it seeks confidential, medical, or
11 private information, private financial information, confidential business or commercial information,
12 trade secrets, proprietary information, or otherwise calls for information protected by Responding
13 Party's right of privacy.

14 Responding Party objects to the interrogatory to the extent it seeks private and confidential
15 information of third parties who are not parties to this lawsuit, and without any notice to said parties.

16 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
17 attorney-privileged communications or attorney work-product.

18 Responding Party objects to this interrogatory on the grounds that it seeks documents or
19 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
20 evidence.

21 Responding Party objects to this interrogatory as overbroad, unduly burdensome and expensive,
22 harassing, duplicative, oppressive, and for the purpose of creating unneeded expense.

23 Responding Party objects that the interrogatory seeks a legal conclusion or opinion.

24 Responding Party objects to this interrogatory as premature to the extent it seeks expert opinions
25 or testimony.

26 Subject to the Preliminary Statement and General Objections, each of which is incorporated
27 herein as though set forth in full, and the foregoing, Responding Party responds as follows:
28

1 (a) Request for Admission No. 1: Admit you have no evidence to support the statement made by
2 your attorney that: James P. Spears “has reaped millions of dollars from [your] estate.” *See, e.g.*,
3 Reporter’s Transcript of Proceedings dated September 29, 2021 in Los Angeles Superior Court case
4 number BP108870 (“SEPTEMBER 29, 2021 HEARING TRANSCRIPT”) at 24:13-15.

5 (b) Responding Party incorporates herein all of the objections asserted in her response to the
6 corresponding Request for Admission.

7 Subject to the Preliminary Statement and General Objections, each of which is incorporated
8 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

9 It is a matter of record, and Mr. Spears himself obviously knows, that he and his phalanx of
10 lawyers have been lavishly compensated for well over a decade, reaping many millions of dollars in
11 connection with a conservatorship or in service of a conservator who has been suspended. Based upon
12 public records and QuickBooks data obtained by Kroll, and as documents and information within
13 Mr. Spears’s own possession show, Mr. Spears took more than \$6 million from the Estate personally, in
14 addition to his “salary” and payments to him for “office space.”

15 (c) Persons with knowledge of the foregoing include Mr. Spears, Tri Star, and Mr. Spears’s
16 counsel.

17 (d) Documents supporting this response include Mr. Spears’s own records and receipts of these
18 payments and those that will be produced and/or made available for inspection by Kroll; reference is
19 made to the forthcoming production to be made by Kroll pursuant to subpoena and Kroll’s
20 responses/supplemental responses and objections thereto.

21 Discovery is ongoing.

22
23 (a) Request for Admission No. 2: Admit you have no evidence to support the statement made by
24 your attorney that: James P. Spears was “taking from [your] estate more money per month than he has
25 allowed [you] to have each month.” *See, e.g.*, SEPTEMBER 29, 2021 HEARING TRANSCRIPT at
26 24:19-20.

27 (b) Responding Party incorporates herein all of the objections asserted in her response to the
28 corresponding Request for Admission.

1 Subject to the Preliminary Statement and General Objections, each of which is incorporated
2 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

3 It is a matter of record, and Mr. Spears himself obviously knows, that he and his phalanx of
4 lawyers have been lavishly compensated for well over a decade, reaping many millions of dollars in
5 connection with a conservatorship or in service of a conservator who has been suspended. Based upon
6 public records and QuickBooks data obtained by Kroll, and as documents and information within
7 Mr. Spears's own possession show, Mr. Spears took more than \$6 million from the Estate personally, in
8 addition to his "salary" and payments to him for "office space."

9 (c) Persons with knowledge of the foregoing include Mr. Spears, Tri Star, and Mr. Spears's
10 counsel.

11 (d) Documents supporting this response include Mr. Spears's own records and receipts of these
12 payments and those that will be produced and/or made available for inspection by Kroll; reference is
13 made to the forthcoming production to be made by Kroll pursuant to subpoena and Kroll's
14 responses/supplemental responses and objections thereto.

15 Discovery is ongoing.

16
17 (a) Request for Admission No. 3: Admit you have no evidence to support the statement made by
18 your attorney that: Alex Vlasov "very credibly provided specific and credible evidence about what
19 [James P. Spears] did here in terms of the bugging and eavesdropping of [you]." *See, e.g.,*
20 SEPTEMBER 29, 2021 HEARING TRANSCRIPT at 38:1-5.

21 (b) Responding Party incorporates herein all of the objections asserted in her response to the
22 corresponding Request for Admission.

23 Subject to the Preliminary Statement and General Objections, each of which is incorporated
24 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

25 Alex Vlasov provided such evidence to *The New York Times*, as corroborated by and detailed in
26 the Declaration of former FBI Special Agent Sherine Ebadi.

27 (c) Persons with knowledge of the foregoing include Mr. Spears, his counsel, Robin Greenhill,
28 Black Box Security, Alex Vlasov, and Sherine Ebadi.

1 (d) Documents supporting this response include confidential court records and those that will be
2 produced and/or made available for inspection by Kroll; reference is made to the forthcoming
3 production to be made by Kroll pursuant to subpoena and Kroll's responses/supplemental responses and
4 objections thereto.

5 Discovery is ongoing.

6
7 (a) Request for Admission No. 4: Admit you have no evidence to support the contention that:
8 James P. Spears "engaged in abusive and bullying conduct toward [you]." *See, e.g.,* Britney Jean
9 Spears's Objections And Opposition To James P. Spears's Petition For Order Confirming, Authorizing,
10 And Instructing Payment On Account Of James P. Spears's Attorneys' Fees From The Estate Or Britney
11 Jean Spears filed January 14, 2022 in Los Angeles Superior Court case number BP108870
12 ("BRITNEY'S JANUARY 2022 FEE PETITION OBJECTIONS") at 2:6-7.

13 (b) Responding Party incorporates herein all of the objections asserted in her response to the
14 corresponding Request for Admission.

15 Subject to the Preliminary Statement and General Objections, each of which is incorporated
16 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

17 Britney Spears already has detailed many of these facts in testimony given on June 23, 2021, and
18 July 14, 2021. Other such evidence is in the possession of James P. Spears and has been revealed by
19 Alex Vlasov, who provided such evidence to *The New York Times*, as corroborated by and detailed in
20 the Declaration of former FBI Special Agent Sherine Ebadi. More to the point, and as is relevant here,
21 the Court already has found that James P. Spears's presence as Conservator was not in the "best
22 interests" of his daughter.

23 (c) Persons with knowledge of the foregoing include Mr. Spears himself (the propounding party
24 here) and his counsel, Tri Star, Black Box Security, Alex Vlasov, and Sherine Ebadi.

25 (d) Documents supporting this response include Mr. Spears's own records and those that will be
26 produced and/or made available for inspection by Kroll; reference is made to the forthcoming
27 production to be made by Kroll pursuant to subpoena and Kroll's responses/supplemental responses and
28 objections thereto.

1 Discovery is ongoing.

2 _____
3 (a) Request for Admission No. 5: Admit you have no evidence to support the contention that:
4 James P. Spears “deprived [you] of fundamental civil liberties, including [your] right to privacy.” *See,*
5 *e.g.*, BRITNEY’S JANUARY 2022 FEE PETITION OBJECTIONS at 2:6-9.

6 (b) Responding Party incorporates herein all of the objections asserted in her response to the
7 corresponding Request for Admission.

8 Subject to the Preliminary Statement and General Objections, each of which is incorporated
9 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

10 Britney Spears already has detailed many of these facts in testimony given on June 23, 2021, and
11 July 14, 2021. Other such evidence is in the possession of James P. Spears and has been revealed by
12 Alex Vlasov, who provided such evidence to *The New York Times*, as corroborated by and detailed in
13 the Declaration of former FBI Special Agent Sherine Ebadi. More to the point, and as is relevant here,
14 the Court already has found that James P. Spears’s presence as Conservator was not in the “best
15 interests” of his daughter.

16 (c) Persons with knowledge of the foregoing include Mr. Spears himself (the propounding party
17 here) and his counsel, Tri Star, Black Box Security, Alex Vlasov, and Sherine Ebadi.

18 (d) Documents supporting this response include confidential court records, Mr. Spears’s own
19 records, and those that will be produced and/or made available for inspection by Kroll; reference is
20 made to the forthcoming production to be made by Kroll pursuant to subpoena and Kroll’s
21 responses/supplemental responses and objections thereto.

22 Discovery is ongoing.

23 _____
24 (a) Request for Admission No. 6: Admit you have no evidence to support the contention that:
25 James P. Spears “engaged in chronic alcohol abuse impairing his ability to serve faithfully.” *See, e.g.*,
26 BRITNEY’S JANUARY 2022 FEE PETITION OBJECTIONS at 2:9-11.

27 (b) Responding Party incorporates herein all of the objections asserted in her response to the
28 corresponding Request for Admission.

1 Subject to the Preliminary Statement and General Objections, each of which is incorporated
2 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

3 These facts are well documented including from Mr. Spears's own admissions, court records,
4 and Jamie Lynn Spears's own statements. More to the point, and as is relevant here, the Court already
5 has found that James P. Spears's presence as Conservator was not in the "best interests" of his daughter.

6 (c) Persons with knowledge of the foregoing include Mr. Spears himself (the propounding party
7 here), his counsel, and Jamie Lynn Spears.

8 (d) Not applicable except to the extent that the ramifications of such conduct are reflected in
9 Mr. Spears's own records or those that will be produced and/or made available for inspection by Kroll;
10 reference is made to the forthcoming production to be made by Kroll pursuant to subpoena and Kroll's
11 responses/supplemental responses and objections thereto.

12 Discovery is ongoing.

13 _____
14 (a) Request for Admission No. 7: Admit you have no evidence to support the contention that:
15 James P. Spears "had actual or apparent conflicts of interest." *See, e.g.,* BRITNEY'S JANUARY 2022
16 FEE PETITION OBJECTIONS at 2:10-11.

17 (b) Responding Party incorporates herein all of the objections asserted in her response to the
18 corresponding Request for Admission.

19 Subject to the Preliminary Statement and General Objections, each of which is incorporated
20 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

21 In 2008, with no apparent source of steady income, no discernible job skills, having already filed
22 for bankruptcy once, and while indebted to a fledgling business management company called Tri Star
23 Sports & Entertainment ("Tri Star") for at least \$40,000 against a loan Tri Star provided to him,
24 Mr. Spears consulted with Tri Star, placed Ms. Spears into the conservatorship, and hired Tri Star as her
25 business manager. Apart from the many millions of dollars reaped by Tri Star from Ms. Spears during
26 the conservatorship, the loan and Mr. Spears's hiring of Tri Star presented a serious, undisclosed,
27 conflict of interest, arguably corrupting the conservatorship from inception. The James P. Spears-Tri
28 Star arrangement also evidently violated California Rule of Court 7.1059(a), which requires

1 conservators to avoid not only “actual conflicts of interest” but also “consistent with his or her fiduciary
2 duty to the conservatee, the appearance of conflicts of interest.” (*See* 2021 California Rules of Court,
3 Rule 7.1059, “Standards of conduct for the conservator of the estate.”)

4 (c) Persons with knowledge of the foregoing include Mr. Spears himself (the propounding party
5 here) and his counsel, Tri Star/Lou Taylor and/or Robin Greenhill, and Sherine Ebadi.

6 (d) Documents supporting this response include confidential court records, Mr. Spears’s own
7 records, and those that will be produced and/or made available for inspection by Kroll; reference is
8 made to the forthcoming production to be made by Kroll pursuant to subpoena and Kroll’s
9 responses/supplemental responses and objections thereto.

10 Discovery is ongoing.

11
12 (a) Request for Admission No. 8: Admit you have no evidence to support the contention that:
13 James P. Spears “used his role as conservator to further his own personal and business interests.” *See*,
14 *e.g.*, BRITNEY’S JANUARY 2022 FEE PETITION OBJECTIONS at 2:10-12.

15 (b) Responding Party incorporates herein all of the objections asserted in her response to the
16 corresponding Request for Admission.

17 Subject to the Preliminary Statement and General Objections, each of which is incorporated
18 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

19 There is evidence demonstrating the autocratic ways in which Mr. Spears ran the
20 conservatorship, elevating his own interests above his daughter’s while ingratiating himself to others,
21 including Tri Star and its founder Lou Taylor, to whom he had previously been financially indebted. By
22 way of illustration and as indicated in the pending Objections to the Twelfth Account Current under the
23 heading “PAYMENT OF LOU TAYLOR’S PERSONAL LEGAL FEES,” Mr. Spears retained
24 counsel—for Lou Taylor—to take legal action against a Britney Spears (and #FreeBritney) supporter
25 named Bryan Kuchar—on behalf of Lou Taylor—on the purported ground that Mr. Kuchar had defamed
26 Ms. Taylor and allegedly misappropriated the name and likeness of Ms. Taylor. According to the
27 pending Objections, that work represented an “impermissible gift of the conservatee’s funds to
28 Ms. Taylor,” and presented “serious conflict of interest issues which were not disclosed to BRITNEY’S

counsel.” (See Conservatee’s Objections To: Twelfth Account Current, filed November 6, 2020, at p. 5.)

Internal emails demonstrate that Mr. Spears’s own lawyer, Vivian Thoreen, conceded that Ms. Taylor’s lawsuit against Mr. Kuchar (aptly entitled *Lou M. Taylor v. Bryan S. Kuchar*, Case 1:19-cv-03028-MLB) was, in fact, “about Lou,” there is no “connection” in the complaint “between Britney and the lawsuit,” and “[Lou] doesn’t even try to weave [Britney] into the complaint,” correctly concluding that “Lou” not Britney should have paid the legal fees at issue. (Ebadi Decl. ¶ 52.)

Further demonstrating Mr. Spears’s mismanagement, after Britney went on hiatus, he unilaterally granted Tri Star’s request for a minimum guarantee of \$500,000 in 2019, “representing a 260% increase from the amount it would otherwise have been entitled to receive for the year.” As the above-referenced Objections further note, “[t]hese radical new arrangements were made by JAMES without any apparent legal obligation to do so. There is no indication that he questioned the propriety of TRI STAR’s huge fee increase, attempted to negotiate a more favorable deal, or even requested supporting detail for the ‘time and billing.’” (See Conservatee’s Objections To: Twelfth Account Current, filed November 6, 2020, at p. 4.)

As detailed in the accompanying Declaration of former FBI Special Agent Sherine Ebadi, Ms. Ebadi has corroborated *The New York Times*’s September 24 bombshell reporting regarding whistleblower Alex Vlasov’s assertions that his former employer Black Box Security (which reported to, and was paid by, Mr. Spears) monitored and contemporaneously captured Britney Spears’s text communications (by mirroring phones used by her)—including attorney-client privileged communications with her counsel—and that Black Box was involved in placing a secret listening device in Britney Spears’s bedroom, at the direction and with the approval of Mr. Spears. Based upon her years of training and experience with the FBI, Ms. Ebadi concluded that these actions could subject Mr. Spears to criminal prosecution under state or federal law, (Ebadi Decl. ¶ 84), and her Declaration further discussed the supporting evidence, including but not limited to the above and statements from Marc Delcore concerning Mr. Spears’s use of the conservatorship and/or its resources to benefit himself.

Further, Mr. Spears’s “salary,” commissions, and payment to himself for office space further demonstrate these facts, as he himself knows.

1 (c) Persons with knowledge of the foregoing include Mr. Spears himself (the propounding party
2 here) and his counsel; Tri Star/Lou Taylor and/or Robin Greenhill; Alex Vlasov, and Sherine Ebadi.

3 (d) Documents supporting this response include those identified in subsection (b) above,
4 confidential court records, Mr. Spears's own records, and those that will be produced and/or made
5 available for inspection by Kroll; reference is made to the forthcoming production to be made by Kroll
6 pursuant to subpoena and Kroll's responses/supplemental responses and objections thereto.

7 Discovery is ongoing.

8
9 (a) Request for Admission No. 9: Admit you have no evidence to support the contention that:
10 James P. Spears "ran a surveillance program that contemporaneously captured his daughter's attorney-
11 client and other communications and included placing a secret listening device in his daughter's
12 bedroom." *See, e.g.*, BRITNEY'S JANUARY 2022 FEE PETITION OBJECTIONS at 24:3-5.

13 (b) Responding Party incorporates herein all of the objections asserted in her response to the
14 corresponding Request for Admission.

15 Subject to the Preliminary Statement and General Objections, each of which is incorporated
16 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

17 In its September 24, 2021 documentary "Controlling Britney Spears" and its accompanying front
18 page report, *The New York Times* revealed that Mr. Spears used Black Box Security to violate Britney
19 Spears's privacy and monitor her attorney-client privileged communications, among others. Previously,
20 Mr. Spears belittled the documentary as a "tv show" and its front-page story as rhetoric without support,
21 but as contained in the evidence itself and the accompanying Declaration of ex-FBI Special Agent
22 Sherine Ebadi, there is substantial support and corroboration in the form of Black Box whistleblower
23 Alex Vlasov (a witness deemed by Ms. Ebadi to be highly credible (Ebadi Decl. ¶ 24)), and, as the
24 Times reported, evidence of Black Box's underlying electronic surveillance of Britney Spears.
25 Mr. Vlasov has also confirmed that Black Box treated Mr. Spears (not his daughter) as its client and that
26 Mr. Spears was the person making the decisions and giving direction. (Ebadi Decl., ¶¶ 23-25; *see also*
27 Ebadi Decl. ¶¶ 27-28 and generally.)
28

1 According to Mr. Vlasov, in or about 2015, and evidently with the knowledge of Tri Star's
2 Robin Greenhill, Mr. Spears instructed Black Box to mirror Britney's iCloud account—where Britney's
3 text messages and content were stored in real time—to a separate iPad that Black Box could see,
4 intercept, and/or review contemporaneously. At the time, Mr. Vlasov told Mr. Yemini that they should
5 not monitor the phone in this way because it made the contents of Ms. Spears's iCloud vulnerable to
6 hackers. Mr. Yemini reportedly relayed Mr. Vlasov's concerns to Mr. Spears and Robin Greenhill, but
7 they said they were willing to take that risk. Black Box did as Mr. Spears instructed, purchasing an iPad
8 and linking it to Britney Spears's iCloud account. The iPad was kept in a safe in Black Box's offices.
9 (Ebadi Decl. ¶¶ 29-30.)

10 Black Box would regularly review the iPad's contents (which again, captured Ms. Spears's
11 communications in real time, contemporaneously) and put the data in encrypted folders before sending
12 them to Mr. Spears, at his request. Sometimes, Mr. Spears would ask Black Box to send him specific
13 items of interest from Ms. Spears's iCloud, such as text messages and communications with her counsel.
14 (Ebadi Decl. ¶¶ 30-31.)

15 In directing these surveillance efforts, Mr. Spears had Black Box provide him access to private
16 communications of his daughter, which his own counsel advised he had no right to see. (Ebadi Decl.
17 ¶ 31.) Mr. Spears expressed particular interest in monitoring his daughter's communications with her
18 personal attorney Sam Ingham, and he wanted regular updates from Black Box on the substance of those
19 attorney-client privileged messages. (Ebadi Decl. ¶ 32.)

20 In what is arguably an even more shocking and unconscionable invasion of Ms. Spears's
21 privacy, Mr. Spears instructed Black Box to place a secret recording device in Ms. Spears's bedroom, in
22 apparent violation of the California Invasion of Privacy Act ("CIPA"), California Penal Code § 630 *et*
23 *seq.* Notably, CIPA requires that all parties consent to a recording of their private conversation and it
24 provides for criminal penalties for individuals who record communications without the necessary two-
25 party consent. It also permits victims to recover treble damages or \$5,000 per violation through a civil
26 action. (*Id.* at §637.2(a).) Accordingly, even if one indulged the fiction that Mr. Spears could "consent"
27 to such recording on behalf of his daughter—a prospect that would shock the conscience and invade
28

1 Ms. Spears’s constitutional rights—no justification would exist for recording the other participants to
2 Ms. Spears’s private conversations.

3 Mr. Vlasov learned of the bedroom surveillance in or around 2018, when Mr. Yemini and a
4 fellow Black Box employee asked him to wipe (eliminate) the contents of a USB drive connected to a
5 digital recording device. The digital recording device had an SD (Digital Memory) card, a battery pack
6 attached to it, and was covered in duct tape. According to Mr. Vlasov, Mr. Spears “loved” the idea of
7 eavesdropping on his daughter and approved and directed the installation. Later, a Black Box employee
8 told Mr. Vlasov that he and Mr. Yemini had listened to the recordings and found nothing “useful.”
9 (Ebadi Decl. ¶ 38; *see* Ebadi Declaration, *passim*.)

10 When Mr. Vlasov plugged the device into his computer, he saw that there were files from 2016-
11 2018 on the device with hundreds of hours of audio recording, including private conversations between
12 Ms. Spears and others, including her children. (Ebadi Decl. ¶ 39.)

13 (c) Persons with knowledge of the foregoing include Mr. Spears himself (the propounding party
14 here) and his counsel; Tri Star/Lou Taylor and/or Robin Greenhill; Alex Vlasov, and Sherine Ebadi.

15 (d) Documents supporting this response include those identified in subsection (b) above,
16 Mr. Spears’s own records, and those that will be produced and/or made available for inspection by
17 Kroll; reference is made to the forthcoming production to be made by Kroll pursuant to subpoena and
18 Kroll’s responses/supplemental responses and objections thereto.

19 Discovery is ongoing.

20 _____
21 (a) Request for Admission No. 10: Admit you have no “*prima facie evidence*” supporting your
22 contention that: James P. Spears falls within a “special class of fiduciaries who, as a matter of
23 precedent, never should be given an additional penny.” *See, e.g.*, BRITNEY’S JANUARY 2022 FEE
24 PETITION OBJECTIONS at ¶ 10.

25 (b) Responding Party incorporates herein all of the objections asserted in her response to the
26 corresponding Request for Admission.

27 Subject to the Preliminary Statement and General Objections, each of which is incorporated
28 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

1 Responding Party incorporates herein, as though fully stated, her responses to Form
2 Interrogatory Response 17.1, regarding Requests for Admission Nos. 1-9.

3 (c) Responding Party incorporates herein, as though fully stated, her responses to Form
4 Interrogatory Response 17.1, regarding Requests for Admission Nos. 1-9.

5 (d) Responding Party incorporates herein, as though fully stated, her responses to Form
6 Interrogatory Response 17.1, regarding Requests for Admission Nos. 1-9.

7 Discovery is ongoing.

8
9 (a) Request for Admission No. 11: Admit James P. Spears did not force or otherwise cause you
10 to take Lithium. *See, e.g.*, BRITNEY’S JANUARY 2022 FEE PETITION OBJECTIONS at ¶ 11.

11 (b) Responding Party incorporates herein all of the objections asserted in her response to the
12 corresponding Request for Admission.

13 (c) Responding Party incorporates herein all of the objections asserted in her response to the
14 corresponding Request for Admission.

15 (d) Responding Party incorporates herein all of the objections asserted in her response to the
16 corresponding Request for Admission.

17 Discovery is ongoing.

18
19 (a) Request for Admission No. 12: Admit you have no evidence to support the contention that:
20 James P. Spears “instructed Black Box to place a secret recording device in Ms. Spears’s bedroom.”
21 *See, e.g.*, BRITNEY’S JANUARY 2022 FEE PETITION OBJECTIONS at ¶ 67.

22 (b) Responding Party incorporates herein all of the objections asserted in her response to the
23 corresponding Request for Admission.

24 Subject to the Preliminary Statement and General Objections, each of which is incorporated
25 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

26 Responding Party incorporates herein, as though fully stated, her responses to Form
27 Interrogatory Response 17.1, regarding Requests for Admission No. 9.

1 (c) Responding Party incorporates herein, as though fully stated, her responses to Form
2 Interrogatory Response 17.1, regarding Requests for Admission No. 9.

3 (d) Responding Party incorporates herein, as though fully stated, her responses to Form
4 Interrogatory Response 17.1, regarding Requests for Admission No. 9.

5 Discovery is ongoing.
6

7 (a) Request for Admission No. 13: Admit you have no evidence to support the contention that:
8 James P. Spears engaged in “self-dealing on Britney’s childhood home.” *See, e.g.*, BRITNEY’S
9 JANUARY 2022 FEE PETITION OBJECTIONS at ¶¶ 81-83.

10 (b) Responding Party incorporates herein all of the objections asserted in her response to the
11 corresponding Request for Admission.

12 Subject to the Preliminary Statement and General Objections, each of which is incorporated
13 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

14 James and Lynne Spears purchased 14550 Greenlaw Church Rd., Kentwood, LA, which was
15 subdivided into three parcels, in July 1980. In August 1986, the bank foreclosed on a portion of this
16 land that included Ms. Spears’s family home. In February 2002, Bridgmore Timber, LLC
17 (“Bridgmore”), an entity owned by Britney Spears, purchased this parcel from the bank for \$56,000.
18 (Ebadi Decl. ¶ 67.)

19 In December 2017—fifteen years later and with James P. Spears now in charge—James P.
20 Spears petitioned the court to purchase this parcel from Bridgmore for \$59,688.18. Among other
21 reasons, Mr. Spears claimed this was in the best interest of the conservatee as the property had
22 decreased significantly in value, had an ongoing tax burden, and would result in a significant loss for
23 Ms. Spears’s Estate. The tax burden in 2016, however, was just \$56.63. (Ebadi Decl. ¶ 68.)

24 In February 2021, just three years after acquiring this property from his daughter’s Estate,
25 Mr. Spears personally sold all three parcels for \$275,000. (Ebadi Decl. ¶ 69.)

26 (c) Persons with knowledge of the foregoing include Mr. Spears himself (the propounding party
27 here), his counsel, and Sherine Ebadi.
28

1 (d) Documents supporting this response include Mr. Spears's own records and those that will be
2 produced and/or made available for inspection by Kroll; reference is made to the forthcoming
3 production to be made by Kroll pursuant to subpoena and Kroll's responses/supplemental responses and
4 objections thereto.

5 Discovery is ongoing.

6
7 (a) Request for Admission No. 14: Admit you have no evidence to support the contention that:
8 James P. Spears "exploited his role as Conservator to prevail upon Ms. Spears's tour staff to help him
9 turn his catering business into a Hollywood career." *See, e.g.,* BRITNEY'S JANUARY 2022 FEE
10 PETITION OBJECTIONS at ¶ 89.

11 (b) Responding Party incorporates herein all of the objections asserted in her response to the
12 corresponding Request for Admission.

13 Subject to the Preliminary Statement and General Objections, each of which is incorporated
14 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

15 By approximately 2010 or 2011, James P. Spears was able to buy himself his own tour bus for
16 hundreds of thousands of dollars, which he then had outfitted with barbecue grills and other specialized
17 cooking equipment. Mr. Spears used that retrofitted tour bus to promote his catering business, Cookin'
18 Cruzin' & Chaos LLC, and it could sometimes be seen outside the Planet Hollywood in Las Vegas,
19 where Ms. Spears was rehearsing and performing. (Ebadi Decl. ¶¶ 58-61.) Kroll's investigation
20 concerning this issue is ongoing, but regardless of how Mr. Spears funded or accounted for his purchase,
21 it is evident that, but for the salary and commissions he drew from the Estate, he would not have had
22 sufficient income to afford the tour bus to use for his Cookin' Cruzin' & Chaos business. (Ebadi Decl.
23 ¶ 59, *et seq.*)

24 Mr. Spears also exploited his role as Conservator to prevail upon Ms. Spears's tour staff to help
25 him turn his catering business into a Hollywood career. More particularly, in 2015, Mr. Spears
26 approached Marc Delcore, the music supervisor who had been working for Ms. Spears, to request that
27 Mr. Delcore use his digital and recording expertise to help Mr. Spears record a promotional reel.
28 Mr. Spears told Mr. Delcore that he needed the reel so he could pitch his own pilot cooking show,

entitled “Cookin’ Cruzin’ and Chaos with Jamie Spears,” to a television network like the “Cooking Channel.” Mr. Spears used Mr. Delcore’s services for his personal use and own benefit. Mr. Spears never offered to pay for Mr. Delcore’s time or services, which would have cost Mr. Spears a significant amount of money if he had not had access to (and freely availed himself of that access to) highly-trained professionals (like Mr. Delcore) who were employed by the Conservatorship. (Ebadi Decl. ¶ 62.)

(c) Persons with knowledge of the foregoing include Mr. Spears himself (the propounding party here), his counsel, and Sherine Ebadi.

(d) Documents supporting this response include Mr. Spears’s own records and those that will be produced and/or made available for inspection by Kroll; reference is made to the forthcoming production to be made by Kroll pursuant to subpoena and Kroll’s responses/supplemental responses and objections thereto.

Discovery is ongoing.

(a) Request for Admission No. 15: Admit you have no evidence to support the contention that: James P. Spears “has done reprehensible things to [you], even as he enriched himself.” *See, e.g.,* BRITNEY’S JANUARY 2022 FEE PETITION OBJECTIONS at ¶ 96.

(b) Responding Party incorporates herein all of the objections asserted in her response to the corresponding Request for Admission.

Subject to the Preliminary Statement and General Objections, each of which is incorporated herein as though set forth in full, and the foregoing, Responding Party responds as follows:

Responding Party incorporates herein, as though fully stated, her responses to Form Interrogatory Response 17.1, regarding Requests for Admission Nos. 1-14.

(c) Responding Party incorporates herein, as though fully stated, her responses to Form Interrogatory Response 17.1, regarding Requests for Admission Nos. 1-14.

(d) Responding Party incorporates herein, as though fully stated, her responses to Form Interrogatory Response 17.1, regarding Requests for Admission Nos. 1-14.

1 Discovery is ongoing.

2
3 (a) Request for Admission No. 16: Admit you have no evidence to support any contention of
4 “mismanagement concerning excessive fees and expenses incurred at Britney’s Louisiana Residence.”
5 *See, e.g.,* BRITNEY’S JANUARY 2022 FEE PETITION OBJECTIONS at 32 n.17.

6 (b) Responding Party incorporates herein all of the objections asserted in her response to the
7 corresponding Request for Admission.

8 Subject to the Preliminary Statement and General Objections, each of which is incorporated
9 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

10 As referenced in the Ebadi Declaration, financial documentation obtained from Tri Star via
11 QuickBooks indicated mismanagement concerning excessive fees and expenses incurred at Britney’s
12 Louisiana Residence. The data “shows that \$178,071.28 of the more than \$1.5 million spent on the
13 Britney’s Louisiana Residence was paid to Advanced Multimedia Partners, Mr. Spears’s son-in-law’s
14 company, for professional services fees, repairs and maintenance, and unidentified charges related to
15 this property from 2012 through 2020. Notably, nearly \$60,000 of the funds paid to this entity were
16 paid in 2014, the same year Mr. Spears evaded the Court’s (astute) request for an explanation for the
17 ‘extraordinarily high expenses’ associated with this property.” (Ebadi Decl. ¶ 79.)

18 (c) Persons with knowledge of the foregoing include Mr. Spears himself (the propounding party
19 here) and his counsel; Tri Star/Lou Taylor and/or Robin Greenhill, and Sherine Ebadi.

20 (d) Documents supporting this response include those that will be produced and/or made
21 available for inspection by Kroll; reference is made to the forthcoming production to be made by Kroll
22 pursuant to subpoena and Kroll’s responses/supplemental responses and objections thereto.

23 Discovery is ongoing.

24
25 (a) Request for Admission No. 18: Admit that the Court in Los Angeles Superior Court case
26 number BP108870 issued an order on February 13, 2009 authorizing James P. Spears to obtain your text
27 messages pursuant to the Stored Communications Act, 18 U.S.C. § 2701 et seq.

1 (b) Responding Party incorporates herein all of the objections asserted in her response to the
2 corresponding Request for Admission.

3 Subject to the Preliminary Statement and General Objections, each of which is incorporated
4 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

5 Mr. Spears knows that he did not have authorization to intercept or monitor text messages,
6 contemporaneously and in real time, which according to the evidence, the allegations of the Black Box
7 Security whistleblower as corroborated by *The New York Times*, and the corroboration of former FBI
8 Special Agent Sherine Ebadi, is what occurred. As Ms. Ebadi's Declaration provides, Black Box
9 purchased an iPad, which was then linked to Ms. Spears's iCloud account, allowing the contents of
10 Ms. Spears's iPhone, which was backed up to the cloud, to be simultaneously accessed and reviewed
11 from the iPad. The iPad was kept in a safe in Black Box's offices. Messrs. Yemini and/or others would
12 regularly review the iPad's contents, *e.g.*, text messages, videos, and other personal data mirrored from
13 Ms. Spears's iPhone, and they would generally put the data in encrypted folders before sending them to
14 Mr. Spears for his review. (Ebadi Decl. ¶ 30.) This conduct, among other conduct, was well outside the
15 scope of the above-referenced document as that document did not authorize or allow Mr. Spears or
16 others to monitor, intercept, or review text messages (much less those between Ms. Spears and her
17 counsel)—contemporaneously and in real time. *See* 18 U.S.C. § 2511 *et seq.* and 18 U.S.C. § 2701(a) *et*
18 *seq.* (Ebadi Decl. ¶ 36.)

19 (c) Persons with knowledge of the foregoing include Mr. Spears himself (the propounding party
20 here) and his counsel; Tri Star/Lou Taylor and/or Robin Greenhill; Edan Yemini, Alex Vlasov, and
21 Sherine Ebadi.

22 (d) Documents supporting this response include Mr. Spears's own records and those that will be
23 produced and/or made available for inspection by Kroll; reference is made to the forthcoming
24 production to be made by Kroll pursuant to subpoena and Kroll's responses/supplemental responses and
25 objections thereto.

1 Discovery is ongoing.

2 _____
3 (a) Request for Admission No. 19: Admit you have no evidence of James P. Spears
4 misappropriating any conservatorship assets.

5 (b) Responding Party incorporates herein all of the objections asserted in her response to the
6 corresponding Request for Admission.

7 Subject to the Preliminary Statement and General Objections, each of which is incorporated
8 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

9 Responding Party incorporates herein, as though fully stated, her responses to Form
10 Interrogatory Response 17.1, regarding Requests for Admission Nos. 1-18.

11 (c) Responding Party incorporates herein, as though fully stated, her responses to Form
12 Interrogatory Response 17.1, regarding Requests for Admission Nos. 1-18.

13 (d) Responding Party incorporates herein, as though fully stated, her responses to Form
14 Interrogatory Response 17.1, regarding Requests for Admission Nos. 1-18.

15 Discovery is ongoing.

16 _____
17 (a) Request for Admission No. 20: Admit you have no evidence of James P. Spears exploiting
18 you for his personal gain.

19 (b) Responding Party incorporates herein all of the objections asserted in her response to the
20 corresponding Request for Admission.

21 Subject to the Preliminary Statement and General Objections, each of which is incorporated
22 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

23 Responding Party incorporates herein, as though fully stated, her responses to Form
24 Interrogatory Response 17.1, regarding Requests for Admission Nos. 1-19.

25 (c) Responding Party incorporates herein, as though fully stated, her responses to Form
26 Interrogatory Response 17.1, regarding Requests for Admission Nos. 1-19.

27 (d) Responding Party incorporates herein, as though fully stated, her responses to Form
28 Interrogatory Response 17.1, regarding Requests for Admission Nos. 1-19.

1 Discovery is ongoing.

2 _____
3 (a) Request for Admission No. 23: Admit you have no evidence of any inaccuracies or
4 improprieties contained in any of the eleven accountings filed in Los Angeles Superior Court case
5 number BP108870 through August 13, 2019.

6 (b) Responding Party incorporates herein all of the objections asserted in her response to the
7 corresponding Request for Admission.

8 Subject to the Preliminary Statement and General Objections, each of which is incorporated
9 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

10 Responding Party incorporates herein, as though fully stated, her responses to Form
11 Interrogatory Response 17.1, regarding Requests for Admission Nos. 1-22. In addition, Responding
12 Party states as follows: Responding Party is informed that Kroll has been unable, to date, to
13 independently verify the amounts that Mr. Spears caused to be distributed from the Estate, in part
14 because of the manner in which the Conservatorship finances were disclosed. The public portions of the
15 accountings themselves expressly note their limitations. For example, in addition to the lack of detail in
16 the accountings themselves, the publicly filed Twelfth Account Current states in Paragraph 9.a that the
17 “Conservatee’s business consists of approximately ten to fifteen entities (wholly owned by the
18 Conservatee) and involves literally many thousands of transactions, including between and among the
19 entities,” and “it would be impractical to fit the business activities and transactions [of Ms. Spears] into
20 the form of the traditional accounting.” Redacted Twelfth Account Current ¶ 9 (filed Aug. 2020).
21 Paragraph 9.b goes on to caveat, “Due to the complexities and volume of information relating to the
22 Conservatee’s business activities, the Twelfth Account diverges from a traditional probate account”
23 Paragraph 9.d continues, “The business activity is reported to the Court in Schedule F of Exhibit 1.
24 Schedule F contains separate independent accountings for each entity. The business activity of the
25 individual entities is not incorporated into the Summary of Account.” And Paragraph 9.e provides,
26 “Most of the active entities were formed after the Conservatorship was established and therefore are not
27 reflected in the Inventories. The entities created after the Conservatorship was established are also not
28

1 reflected in the Schedule of Property on Hand at the End of Account Period for the reasons set forth in
2 this paragraph.”

3 Mr. Spears failed to disclose and, in fact, evidently concealed the extent of his misconduct
4 including in connection with the spying apparatus referenced in the record in violation of *Hudson v.*
5 *Foster*, applicable caselaw, and his fiduciary duties.

6 (c) Responding Party incorporates herein, as though fully stated, her responses to Form
7 Interrogatory Response 17.1, regarding Requests for Admission Nos. 1-22.

8 (d) Responding Party incorporates herein, as though fully stated, her responses to Form
9 Interrogatory Response 17.1, regarding Requests for Admission Nos. 1-22.

10 Discovery is ongoing.

11 _____
12 (a) Request for Admission No. 24: Admit you have no evidence of any inaccuracies or
13 improprieties contained in the Twelfth Account Current; Report of James P. Spears, Conservator Of The
14 Estate; Petition For Its Settlement And Approval Thereof filed August 6, 2020 in Los Angeles Superior
15 Court case number BP108870 other than what is alleged in Britney Jean Spears’s Objections And
16 Opposition To James P. Spears’s Petition For Order Confirming, Authorizing, And Instructing Payment
17 On Account Of James P. Spears’s Attorneys’ Fees From The Estate Or Britney Jean Spears filed
18 January 14, 2022 in Los Angeles Superior Court case number BP108870.

19 (b) Responding Party incorporates herein all of the objections asserted in her response to the
20 corresponding Request for Admission.

21 Subject to the Preliminary Statement and General Objections, each of which is incorporated
22 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

23 Responding Party incorporates herein, as though fully stated, her responses to Form
24 Interrogatory Response 17.1, regarding requests for admission Nos. 1-23. In addition, Responding Party
25 states as follows: Responding Party is informed that Kroll has been unable, to date, to independently
26 verify the amounts that Mr. Spears caused to be distributed from the Estate, in part because of the
27 manner in which the Conservatorship finances were disclosed. The public portions of the accountings
28 themselves expressly note their limitations. For example, in addition to the lack of detail in the

1 accountings themselves, the publicly filed Twelfth Account Current states in Paragraph 9.a that the
2 “Conservatee’s business consists of approximately ten to fifteen entities (wholly owned by the
3 Conservatee) and involves literally many thousands of transactions, including between and among the
4 entities,” and “it would be impractical to fit the business activities and transactions [of Ms. Spears] into
5 the form of the traditional accounting.” Redacted Twelfth Account Current ¶ 9 (filed Aug. 2020).
6 Paragraph 9.b goes on to caveat, “Due to the complexities and volume of information relating to the
7 Conservatee’s business activities, the Twelfth Account diverges from a traditional probate account”
8 Paragraph 9.d continues, “The business activity is reported to the Court in Schedule F of Exhibit 1.
9 Schedule F contains separate independent accountings for each entity. The business activity of the
10 individual entities is not incorporated into the Summary of Account.” And Paragraph 9.e provides,
11 “Most of the active entities were formed after the Conservatorship was established and therefore are not
12 reflected in the Inventories. The entities created after the Conservatorship was established are also not
13 reflected in the Schedule of Property on Hand at the End of Account Period for the reasons set forth in
14 this paragraph.”

15 Mr. Spears failed to disclose and, in fact, evidently concealed the extent of his misconduct
16 including in connection with the spying apparatus referenced in the record in violation of *Hudson v.*
17 *Foster*, applicable caselaw and his fiduciary duties.

18 (c) Responding Party incorporates herein, as though fully stated, her responses to Form
19 Interrogatory Response 17.1, regarding Requests for Admission Nos. 1-23.

20 (d) Responding Party incorporates herein, as though fully stated, her responses to Form
21 Interrogatory Response 17.1, regarding Requests for Admission Nos. 1-23.

22 Discovery is ongoing.
23

24 DATED: June 14, 2022

GREENBERG TRAURIG, LLP

25
26 By /s/ Mathew S. Rosengart

27 Mathew S. Rosengart

28 Attorneys for Britney Jean Spears

1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA**

3 **COUNTY OF LOS ANGELES**

4 I am employed in the aforesaid county, State of California; I am over the age of 18 years and not a
5 party to the within action; my business address is **1840 Century Park East, Suite 1900, Los Angeles,**
6 **CA 90067-2121.**

7 On June 14, 2022, I caused the document described as **BRITNEY JEAN SPEARS'S FIRST**
8 **AMENDED RESPONSES TO FIRST SET OF FORM INTERROGATORIES FROM JAMES P.**
9 **SPEARS** to be transmitted to the addressee(s) listed on the attached Service List:

10 ☒ **(BY E-SERVICE)** I caused the document(s) to be sent to the person(s) at the e-mail address(es)
11 indicated on the attached service list.

12 ☒ **(STATE)** I declare under penalty of perjury under the laws of the State of California that the
13 foregoing is true and correct.

14 Executed on June 14, 2022, at Los Angeles, California.

15 /s/ Heather J. Silver

16 Heather J. Silver

**SERVICE LIST
CASE BP108870**

Alex Weingarten Willkie Farr & Gallagher, LLP 2029 Century Park East, Suite 400 Los Angeles, CA 90067 Email; aweingarten@willkie.com ebakewell@willkie.com Tel: 310-855-3000/Fax: 310-855-3099	Attorneys for James P. Spears Suspended Conservator of the Estate
Vivian L. Thoreen Jonathan H. Park HOLLAND & KNIGHT, LLP 400 S. Hope Street, 8th Floor Los Angeles, CA 90071 Tel: 213-896-2400/ Fax: 213-896-2450 Email: vivian.thoreen@hklaw.com jonathan.park@hklaw.com	Former Attorneys for James P. Spears, Suspended Conservator of the Estate
Geraldine A. Wyle Jeryll S. Cohen FREEMAN FREEMAN & SMILEY, LLP 1888 Century Park East, Suite 1500 Los Angeles, CA 90067 Email: Geraldine.wyle@ffslaw.com Jeryll.cohen@ffslaw.com	Former Attorneys for James P. Spears, Suspended Conservator of the Estate
Yasha Bronshteyn GINZBURG & BRONSHTEYN, LLP 11111 Santa Monica Blvd., Suite. 1840 Los Angeles CA 90025 Tel: 310-914-3222 Email: yasha@gblp-law.com	Attorneys for Lynne Spears, Mother of Former Conservatee
Gladstone N. Jones, III Lynn E. Swanson JONES SWANSON HUDDALL & GARRISON, LLC Pan-American Life Center 601 Poydras Street, Suite 2655 New Orleans, LA 70130 Tel: 504-523-2500 Email: gjones@jonesswanson.com; lswanson@jonesswanson.com	Attorneys for Lynne Spears, Mother of Former Conservatee

Lauriann C. Wright Marie Mondia WRIGHT KIM DOUGLAS, ALC 130 S. Jackson Street Glendale, CA 91205-1123 Tel: 626-356-3900 Email: lauriann@wkdlegal.com marie@wkdlegal.com	Attorneys for Jodi Montgomery
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Amended Responses to Requests for Admission

GREENBERG TRAUIG, LLP

MATHEW S. ROSENGART (SBN 255750) (*RosengartM@gtlaw.com*)

SCOTT D. BERTZYK (SBN 116449) (*BertzkyS@gtlaw.com*)

LISA C. MCCURDY (SBN 228755) (*McCurdyL@gtlaw.com*)

MATTHEW R. GERSHMAN (SBN 253031) (*GershmanM@gtlaw.com*)

1840 Century Park East, Suite 1900

Los Angeles, CA 90067-2121

Tel: 310-586-7700

Fax: 310-586-7800

Attorneys for Britney Jean Spears

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES, CENTRAL DISTRICT

In re the Conservatorship of the Person and
Estate of BRITNEY JEAN SPEARS

Case No. BP108870

Hon. Brenda J. Penny, Dept. 4

**BRITNEY JEAN SPEARS'S FIRST AMENDED
RESPONSES TO JAMES P. SPEARS'S FIRST
SET OF REQUESTS FOR ADMISSION**

PROPOUNDING PARTY: JAMES P. SPEARS

RESPONDING PARTY: BRITNEY JEAN SPEARS

SET NO. ONE

1 Britney Jean Spears (“Responding Party”) provides these first amended responses and objections
2 to James P. Spears’s First Set Requests for Admission (Set One), as follows:

3 **PRELIMINARY STATEMENT**

4 On July 26, 2021, Britney Spears, through the undersigned counsel, filed her Verified Petition
5 for Suspension and Removal of James P. Spears as Conservator of the Estate. After extensive briefing
6 and argument and a lengthy hearing, on September 29, 2021, the Court suspended James P. Spears,
7 determining that the conservatorship he had run was “toxic” and that the suspension of Mr. Spears was
8 proper and in the best interests of the conservatee. Thus, after enduring a 13-plus year conservatorship,
9 from which Mr. Spears enriched himself by reaping at least \$6 million in salary, fees, and
10 commissions—even though he was not a talent representative, but was instead supposed to have been
11 serving as a fiduciary—Britney Spears was set free. Regrettably, rather than letting her live her life and
12 moving on, Mr. Spears has nevertheless continued to importune, seeking to harass and bully his
13 daughter, including in connection with improper, abusive discovery involving *145 document requests*
14 *alone*.

15 Mr. Spears expressly placed his misconduct at issue in his December 15, 2021 fee petition, and
16 all of the facts surrounding his misconduct are within his possession, custody, and control. This is not a
17 game, and he should stop treating it like one. He should fulfill his final fiduciary duties, act like a
18 fiduciary (if not a decent father), and move on. What is all the more disgraceful is that Mr. Spears has
19 failed to search for or produce any text messages concerning his patent and potentially-criminal
20 misconduct (which he placed directly at issue in this case); has failed to comply with his written
21 discovery obligations (instead issuing boilerplate, blanket objections); and has inexcusably evaded his
22 deposition for eight months—even as he falsely claimed he “has nothing to hide” and would therefore
23 “hide nothing” and that he would act with “unconditional” cooperation and transparency.

24 Although he has repeatedly and discordantly referred to himself as a “loving father”—indeed, he
25 and his counsel spent substantial conservatorship funds (*Britney Spears’s funds*) on a media tour to try,
26 with futility, to convey such an image—the evidence of abuses endured by Ms. Spears under the
27 conservatorship imposed by her father and kept in place for well over a decade, is manifest. He knows
28 this. The abusive discovery he purports to have propounded further proves this point.

1 While enriching himself from the conservatorship, making himself a multi-millionaire at his
2 daughter's expense on the heels of his admitted alcohol abuse, lack of a career, and long history of
3 financial mismanagement, including tax liens, mortgage defaults, failed business ventures, and a
4 Chapter 7 bankruptcy, Mr. Spears stripped his daughter of fundamental liberties, worked his daughter to
5 the point of exhaustion, and ran a toxic conservatorship that was borne of, and seriously tainted by,
6 significant conflicts of interest in violation of, among other things, the California Rules of Court. *See*
7 Cal. R. Ct. No. 7.1059, *et seq.* ("Standards of conduct for the conservator of the estate").

8 By way of brief illustration only, Mr. Spears admittedly borrowed substantial monies from Tri
9 Star Sports & Entertainment ("Tri Star") shortly before placing his daughter into the conservatorship
10 and then (despite her supposed incapacity), he sent her on a grueling 97-show international tour and
11 onto other work from which he and others obtained millions of dollars. As Anthony Palmieri, President
12 of the National Guardianship Association, an organization representing conservators, recently stated,
13 "[t]he existence of the Tri Star loan . . . is troubling." "It makes me wonder where the allegiance lies. Is
14 the conservator making decisions in the best interest of the conservatee or the business manager who
15 they owe a debt to? ***It reeks of conflict of interest***" (emphasis added).¹ *See also* California Rules of
16 Court governing conservators, Cal. R. Ct. No. 7.1059(a) ("The conservator must avoid actual conflicts
17 of interest and, consistent with his or her fiduciary duty to the conservatee, the appearance of conflicts
18 of interest." Further, "[t]he conservator must avoid any personal, business, or professional interest or
19 relationship that is or reasonably could be perceived as being self-serving or adverse to the best interest
20 of the conservatee"); Cal. R. Ct. No. 7.1059(a) (2)-(4); 7.1059(b).

21 Additionally, as described in *The New York Times*' extensive, detailed reporting, and as further
22 corroborated by ex-FBI Special Agent Sherine Ebadi, Mr. Spears directed or was involved in an intense
23 surveillance operation of his own daughter, which reportedly included placing a secret listening device
24 in her private bedroom and capturing (***in real time and contemporaneously***) her private
25 communications, ***including sacrosanct, privileged communications with her counsel***. In addition to
26 these gross invasions of privacy, as the record demonstrates, Mr. Spears (while acting as Conservator),

27
28 ¹ *See* Liz Day, Emily Steel, Rachel Abrams, and Samantha Stark, *Britney Spears Felt Trapped. Her Business Manager Benefited*, *The New York Times* (Dec. 19, 2021), <https://www.nytimes.com/2021/12/19/business/britney-spears-conservatorship-tri-star.html>.

1 engaged in self-dealing, diversion of conservatorship resources, and misuse of his daughter's funds.
2 During his tenure serving as Conservator, Mr. Spears was also subjected to a Domestic Violence
3 Restraining Order, resulting from allegations of harassment or abuse of his own daughter's child or
4 children.²

5 Although Mr. Spears's breaches of fiduciary duties and other misconduct are obvious, he has
6 repeatedly, falsely claimed that he has "nothing to hide," will "hide nothing," and will "unconditionally
7 cooperate" with counsel, with "complete transparency without conditions."³ He continues to hide and
8 obstruct, however. Among other things, Mr. Spears has now failed no less than three times to appear for
9 his deposition. He has also failed, for numerous months, to answer fundamental questions concerning,
10 among other things, (i) his role in eavesdropping on his daughter, including contemporaneously
11 capturing his daughter's text communications (*including with her attorney*) and the placement of a
12 secret listening device in her private bedroom; (ii) the total fees taken or received by James P. Spears (or
13 any entity in which he had any interest) from Britney Spears or her Estate; (iii) why Ms. Spears's net
14 worth was so "shockingly low" relative to her gross earnings of hundreds of millions of dollars during
15 the past decade, *see Britney Spears' Net Worth Revealed—And It's Shockingly Low Compared to Her*
16 *Pop Peers, Forbes*, Feb. 17, 2021; (iv) all corporate formation documents for all entities created for the
17 purported benefit of Britney Spears or her Estate; and (v) other economic and related questions
18 concerning how Mr. Spears administered the conservatorship he imposed in 2008.

19 Rather than answering these questions and cooperating with Ms. Spears's efforts to obtain
20 relevant, fundamental truthful information and answering questions under oath at deposition, which he
21 is bound to do as a fiduciary (and which he would be obligated to do even if he were *not* a fiduciary), as
22 referenced above, Mr. Spears has harassed and bullied his daughter. By way of illustration, in October
23 2021, Mr. Spears baldly objected to every single discovery request propounded by Ms. Spears. Further,
24

25 ² Instead of seeking to place her into an LPS conservatorship with a higher burden and a statutory framework that presumes
26 that the conservatee's mental health can improve and contains stringent requirements and protections for the conservatee,
27 Mr. Spears placed his daughter into a long-term probate conservatorship generally intended for those with "dementia," whose
28 situations cannot or most likely will not improve, without filing a declaration of incapacity.

³ See James P. Spears's November 1, 2021 "Status Report." Pursuant to applicable caselaw, Mr. Spears himself will be
responsible for all legal costs and fees he incurs in connection with these matters.

1 even as he has incongruously failed to appear for deposition or produce documents and information in a
2 timely, organized, Bates labeled, and professional manner (including those that are no longer privileged,
3 post-his September 29, 2021, suspension pursuant to the *Moeller* and *Stine* cases, because the privilege
4 rests not with Mr. Spears, but with the Estate), Mr. Spears has purported to serve on his daughter **145**
5 document requests alone, as well as more than 75 other discovery requests.

6 Mr. Spears's tactics of trying to intimidate, harass, and bully his daughter (even after he was
7 ignominiously suspended by the Court as her Conservator) must cease. Relatedly, his unduly
8 burdensome, irrelevant, and oppressive "discovery" is improper and objectionable for the reasons set
9 forth herein; but as an overriding matter, it is *uniquely* improper and objectionable because Mr. Spears
10 stripped his daughter of civil liberties and grossly invaded her privacy for 13 years. Now that he has
11 been suspended and the conservatorship terminated, his efforts to misuse discovery to even further
12 invade his daughter's privacy simply cannot be countenanced.

13 Even putting this aside, however, perhaps most abusively, and improperly, Mr. Spears has
14 outrageously used his daughter as a pawn, seeking to barter his deposition for hers. Mr. Spears must
15 know (or certainly should know) that any such deposition would be abjectly pointless insofar as this
16 litigation (which *he* commenced) concerns the acts and omissions of Mr. Spears and, thus, all relevant
17 information is uniquely within his possession, custody, and control. Indeed, this unavoidable truth has
18 been discussed at length in meet and confer discussions between counsel; as to Mr. Spears's professed
19 right to inquire into Britney Spears's "claims," Ms. Spears' counsel has made clear time and again that
20 the "claims" to which Mr. Spears refers are not claims of Britney Spears. Instead, those topics flow
21 from the privileged investigation of former FBI Special Agent Sherine Ebadi, the accounts of a former
22 Black Box Security employee and whistleblower, Alex Vlasov, *The New York Times*, and other sources
23 and parties that are *not* Britney Spears. Revealing the true nature of Mr. Spears's desire to depose
24 Britney Spears, Mr. Spears's counsel, in a January 26, 2022 email, expressed Mr. Spears's interest in
25 questioning his daughter regarding "child safety . . . and [possible] drug use," and took the incredible
26 and despicable step of leaking that objective (not a pleading, not a public filing, but an email with that
27 objective) to the press, all to serve his diabolical "strategy" of upsetting his daughter.

1 Thus, two things are true: (1) it is evident that Mr. Spears has no shame and will continue his
2 campaign to intimidate and harass his own daughter, including by his efforts to make her sit for a
3 deposition that would have no object other than to harass and upset her (he hopes); and (2) his written
4 discovery served on Ms. Spears is misplaced, targeting “allegations” that are not allegations of Britney
5 Spears and about which there is no legitimate, good faith basis to question her here. Nonetheless,
6 following meet and confer discussions, while reserving all rights, and solely in an effort to avoid
7 unnecessary and costly motion practice, these amended responses are being served. These amended
8 responses do not imply any obligation to provide information and documents in the possession, custody
9 and control of others. Instead, these amended responses demonstrate that there is no legitimate basis for
10 Mr. Spears to pursue his daughter’s deposition. (*See City of King City v. Community Bank of Central*
11 *California*, 131 Cal. App. 4th 913, 933 (2005) (the inquiry focuses on “whether discovery would
12 produce additional admissible evidence”) (emphasis in original); *see also Calcor Space Facility, Inc. v.*
13 *Superior Court*, 53 Cal. App. 4th 216, 223 (1997) (observing that discovery abuse is a “cancer [that] is
14 spreading,” and that, accordingly, judges must be aggressive in curbing it and insisting that discovery be
15 used properly and not as a tactic for improper purposes); *Rifkind v. Superior Court*, 22 Cal. App. 4th
16 1255 (1994) (“If the deposing party ... wants to know what the adverse party is contending, or how it
17 rationalizes the facts a supporting a contention, it may ask that question in an interrogatory”); *Estate of*
18 *Ruchti*, 12 Cal. App. 4th 1593, 1602 (1993) (“other discovery devices less intrusive to the attorney/client
19 privilege and work product protection, such as interrogatories, would have been appropriate”); *Pacific*
20 *Architects Collaborative v. State of Cal.*, 100 Cal. App. 3d 110, 126-127 (1979) (deposition not
21 appropriate where subject matter was not relevant to issues at hand).)

22 * * *

23 The following amended responses and objections are based only upon information presently
24 available to and specifically known by Responding Party. Facts and evidence now known may be
25 imperfectly understood. Additionally, discovery is ongoing in this matter. Accordingly, Responding
26 Party reserves the right to further modify or amend these responses on the basis of subsequently
27 acquired knowledge, information, or understanding. These responses reflect the information that is
28 presently available to Responding Party as derived from such investigation as was possible prior to the

1 date of these responses. Responding Party expressly reserves the right to further amend, add to, delete
2 from, or otherwise modify or supplement each response, to produce documents and/or to make such
3 claims and contentions as may be appropriate when Responding Party has concluded discovery and has
4 ascertained more relevant facts. No incidental or implied admissions are intended or should be
5 construed from any response. The fact that Responding Party provides a response to part or all of any
6 request is not intended and shall not be construed to be a waiver by Responding Party of all or any part
7 of any objection to any such requests. Responding Party's responses are made without waiver of the
8 following rights, and, on the contrary, are intended to preserve and do preserve the following:

9 (i) the right to raise all questions of authenticity, foundation, relevancy, materiality,
10 privilege, and admissibility as evidence for any purpose of the information identified in response to the
11 requests which may arise in any subsequent proceedings in, or trial, if any, of, this or any other action;

12 (ii) the right to object on any ground to the use of said information identified in response to
13 the requests in any subsequent proceeding in, or hearing of, this or any other action;

14 (iii) the right to object on any ground to the introduction into evidence of information
15 identified in response to the requests;

16 (iv) the right to object on any ground at any time to other discovery involving the information
17 provided; and,

18 (v) the right to further amend or supplement these responses in the event that any
19 information is unintentionally omitted. Inadvertent identification or production of privileged documents
20 or information by Responding Party is not a waiver of any applicable privilege.

21 This Preliminary Statement is incorporated into each response set forth below.

22 **GENERAL OBJECTIONS**

23 1. Responding Party objects to each request to the extent it invades the attorney-client
24 privilege, the attorney work product doctrine, and/or any other applicable privilege or immunity.

25 2. Responding Party objects to each request to the extent it is vague, ambiguous, overbroad,
26 unduly burdensome, oppressive, irrelevant, or not proportional to the needs of the case.

27 3. Responding Party objects to each request to the extent it seeks information and/or the
28 identification or production of documents not within Responding Party's possession, custody, or control.

1 4. Responding Party objects to each request to the extent it attempts or purports to impose
2 obligations beyond those created by the Code of Civil Procedure or to provide a response for or on
3 behalf of any other person or entity.

4 5. Responding Party objects to each request to the extent it seeks information and/or the
5 identification or production of documents that are publicly available and/or uniquely or equally
6 available to James P. Spears.

7 6. Responding Party objects to each request to the extent that it calls for the production of
8 proprietary, trade secret, and/or commercially sensitive information, or the personal or confidential
9 information of third parties.

10 7. Responding Party objects to each request to the extent the referenced timeframe is vague,
11 ambiguous, and/or overbroad.

12 8. Responding Party objects to each request to the extent it seeks information based on
13 electronically stored information (ESI), the recovery or restoration of which is unduly burdensome and
14 expensive.

15 9. Responding Party objects to each request to the extent the discovery sought is not
16 relevant to any matters before the court, nor reasonably calculated to lead to the discovery of admissible
17 evidence regarding those matters.

18 These General Objections are incorporated into each response set forth below.

19 **RESPONSES TO REQUESTS FOR ADMISSION**

20 **REQUEST FOR ADMISSION NO. 1:**

21 Admit you have no evidence to support the statement made by your attorney that: James
22 P. Spears “has reaped millions of dollars from [your] estate.” *See, e.g.*, Reporter’s Transcript of
23 Proceedings dated September 29, 2021 in Los Angeles Superior Court case number BP108870
24 (“SEPTEMBER 29, 2021 HEARING TRANSCRIPT”) at 24:13-15.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

26 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
27 in full. Further:

1 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
2 the early stages of discovery and particularly because of James P. Spears's failure to cooperate in
3 discovery in this matter.

4 Responding Party objects to this request on the grounds that it seeks information that is neither
5 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

6 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

7 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
8 privileged communications or attorney work-product.

9 Responding Party objects to this request as premature to the extent it seeks expert opinions or
10 testimony.

11 Responding Party objects to the extent that the request seeks information outside of Responding
12 Party's possession, custody, and control, and/or particularly within James P. Spears's possession,
13 custody, and control.

14 **AMENDED RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

15 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
16 in full. Further:

17 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
18 the early stages of discovery and particularly because of James P. Spears's failure to cooperate in
19 discovery in this matter.

20 Responding Party objects to this request on the grounds that it seeks information that is neither
21 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

22 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

23 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
24 privileged communications or attorney work-product.

25 Responding Party objects to this request as premature to the extent it seeks expert opinions or
26 testimony.

1 Responding Party objects to the extent that the request seeks information outside of Responding
2 Party's possession, custody, and control, and/or particularly within James P. Spears's possession,
3 custody, and control.

4 Subject to the Preliminary Statement and General Objections, each of which is incorporated
5 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

6 Denied.

7 **REQUEST FOR ADMISSION NO. 2:**

8 Admit you have no evidence to support the statement made by your attorney that: James
9 P. Spears was "taking from [your] estate more money per month than he has allowed [you] to have each
10 month." *See, e.g.*, SEPTEMBER 29, 2021 HEARING TRANSCRIPT at 24:19-20.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

12 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
13 in full. Further:

14 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
15 the early stages of discovery and particularly because of James P. Spears's failure to cooperate in
16 discovery in this matter.

17 Responding Party objects to this request on the grounds that it seeks information that is neither
18 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

19 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

20 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
21 privileged communications or attorney work-product.

22 Responding Party objects to this request as premature to the extent it seeks expert opinions or
23 testimony.

24 Responding Party objects to the extent that the request seeks information outside of Responding
25 Party's possession, custody, and control, and/or particularly within James P. Spears's possession,
26 custody, and control.

1 **AMENDED RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

2 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
3 in full. Further:

4 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
5 the early stages of discovery and particularly because of James P. Spears's failure to cooperate in
6 discovery in this matter.

7 Responding Party objects to this request on the grounds that it seeks information that is neither
8 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

9 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

10 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
11 privileged communications or attorney work-product.

12 Responding Party objects to this request as premature to the extent it seeks expert opinions or
13 testimony.

14 Responding Party objects to the extent that the request seeks information outside of Responding
15 Party's possession, custody, and control, and/or particularly within James P. Spears's possession,
16 custody, and control.

17 Subject to the Preliminary Statement and General Objections, each of which is incorporated
18 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

19 Denied.

20 **REQUEST FOR ADMISSION NO. 3:**

21 Admit you have no evidence to support the statement made by your attorney that: Alex Vlasov
22 "very credibly provided specific and credible evidence about what [James P. Spears] did here in terms
23 of the bugging and eavesdropping of [you]." *See, e.g.,* SEPTEMBER 29, 2021 HEARING
24 TRANSCRIPT at 38:1-5.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 3:**

26 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
27 in full. Further:

1 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
2 the early stages of discovery and particularly because of James P. Spears's failure to cooperate in
3 discovery in this matter.

4 Responding Party objects to this request on the grounds that it seeks information that is neither
5 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

6 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

7 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
8 privileged communications or attorney work-product.

9 Responding Party objects to this request as premature to the extent it seeks expert opinions or
10 testimony.

11 Responding Party objects to the extent the request seeks information outside of Responding
12 Party's possession, custody, and control.

13 **AMENDED RESPONSE TO REQUEST FOR ADMISSION NO. 3:**

14 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
15 in full. Further:

16 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
17 the early stages of discovery and particularly because of James P. Spears's failure to cooperate in
18 discovery in this matter.

19 Responding Party objects to this request on the grounds that it seeks information that is neither
20 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

21 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

22 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
23 privileged communications or attorney work-product.

24 Responding Party objects to this request as premature to the extent it seeks expert opinions or
25 testimony.

26 Responding Party objects to the extent the request seeks information outside of Responding
27 Party's possession, custody, and control.

1 Subject to the Preliminary Statement and General Objections, each of which is incorporated
2 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

3 Denied.

4 **REQUEST FOR ADMISSION NO. 4:**

5 Admit you have no evidence to support the contention that: James P. Spears “engaged in
6 abusive and bullying conduct toward [you].” *See, e.g.*, Britney Jean Spears’s Objections And
7 Opposition To James P. Spears’s Petition For Order Confirming, Authorizing, And Instructing Payment
8 On Account Of James P. Spears’s Attorneys’ Fees From The Estate Or Britney Jean Spears filed
9 January 14, 2022 in Los Angeles Superior Court case number BP108870 (“BRITNEY’S JANUARY
10 2022 FEE PETITION OBJECTIONS”) at 2:6-7.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

12 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
13 in full. Further:

14 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
15 the early stages of discovery and particularly because of James P. Spears’s failure to cooperate in
16 discovery in this matter.

17 Responding Party objects to this request on the grounds that it seeks information that is neither
18 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

19 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

20 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
21 privileged communications or attorney work-product.

22 Responding Party objects to this request as premature to the extent it seeks expert opinions or
23 testimony.

24 Responding Party objects to the extent that the request seeks information outside of Responding
25 Party’s possession, custody, and control, and/or particularly within James P. Spears’s possession,
26 custody, and control.

1 **AMENDED RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

2 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
3 in full. Further:

4 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
5 the early stages of discovery and particularly because of James P. Spears's failure to cooperate in
6 discovery in this matter.

7 Responding Party objects to this request on the grounds that it seeks information that is neither
8 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

9 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

10 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
11 privileged communications or attorney work-product.

12 Responding Party objects to this request as premature to the extent it seeks expert opinions or
13 testimony.

14 Responding Party objects to the extent the request seeks information outside of Responding
15 Party's possession, custody, and control.

16 Subject to the Preliminary Statement and General Objections, each of which is incorporated
17 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

18 Denied.

19 **REQUEST FOR ADMISSION NO. 5:**

20 Admit you have no evidence to support the contention that: James P. Spears "deprived [you] of
21 fundamental civil liberties, including [your] right to privacy." *See, e.g.,* BRITNEY'S JANUARY 2022
22 FEE PETITION OBJECTIONS at 2:6-9.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

24 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
25 in full. Further:

26 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
27 the early stages of discovery and particularly because of James P. Spears's failure to cooperate in
28 discovery in this matter.

1 Responding Party objects to this request on the grounds that it seeks information that is neither
2 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

3 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

4 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
5 privileged communications or attorney work-product.

6 Responding Party objects to this request as premature to the extent it seeks expert opinions or
7 testimony.

8 Responding Party objects to the extent that the request seeks information outside of Responding
9 Party's possession, custody, and control, and/or particularly within James P. Spears's possession,
10 custody, and control.

11 **AMENDED RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

12 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
13 in full. Further:

14 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
15 the early stages of discovery and particularly because of James P. Spears's failure to cooperate in
16 discovery in this matter.

17 Responding Party objects to this request on the grounds that it seeks information that is neither
18 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

19 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

20 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
21 privileged communications or attorney work-product.

22 Responding Party objects to this request as premature to the extent it seeks expert opinions or
23 testimony.

24 Responding Party objects to the extent the request seeks information outside of Responding
25 Party's possession, custody, and control.

26 Subject to the Preliminary Statement and General Objections, each of which is incorporated
27 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

28 Denied.

1 **REQUEST FOR ADMISSION NO. 6:**

2 Admit you have no evidence to support the contention that: James P. Spears “engaged in
3 chronic alcohol abuse impairing his ability to serve faithfully.” *See, e.g.,* BRITNEY’S JANUARY 2022
4 FEE PETITION OBJECTIONS at 2:9-11.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

6 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
7 in full. Further:

8 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
9 the early stages of discovery and particularly because of James P. Spears’s failure to cooperate in
10 discovery in this matter.

11 Responding Party objects to this request on the grounds that it seeks information that is neither
12 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

13 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

14 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
15 privileged communications or attorney work-product.

16 Responding Party objects to this request as premature to the extent it seeks expert opinions or
17 testimony.

18 Responding Party objects to the extent that the request seeks information outside of Responding
19 Party’s possession, custody, and control, and/or particularly within James P. Spears’s possession,
20 custody, and control.

21 **AMENDED RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

22 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
23 in full. Further:

24 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
25 the early stages of discovery and particularly because of James P. Spears’s failure to cooperate in
26 discovery in this matter.

27 Responding Party objects to this request on the grounds that it seeks information that is neither
28 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

1 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

2 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
3 privileged communications or attorney work-product.

4 Responding Party objects to this request as premature to the extent it seeks expert opinions or
5 testimony.

6 Responding Party objects to the extent the request seeks information outside of Responding
7 Party's possession, custody, and control.

8 Subject to the Preliminary Statement and General Objections, each of which is incorporated
9 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

10 Denied.

11 **REQUEST FOR ADMISSION NO. 7:**

12 Admit you have no evidence to support the contention that: James P. Spears "had actual or
13 apparent conflicts of interest." *See, e.g.,* BRITNEY'S JANUARY 2022 FEE PETITION OBJECTIONS
14 at 2:10-11.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 7:**

16 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
17 in full. Further:

18 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
19 the early stages of discovery and particularly because of James P. Spears's failure to cooperate in
20 discovery in this matter.

21 Responding Party objects to this request on the grounds that it seeks information that is neither
22 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

23 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

24 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
25 privileged communications or attorney work-product.

26 Responding Party objects to this request as premature to the extent it seeks expert opinions or
27 testimony.

1 Responding Party objects to the extent that the request seeks information outside of Responding
2 Party's possession, custody, and control, and/or particularly within James P. Spears's possession,
3 custody, and control.

4 **AMENDED RESPONSE TO REQUEST FOR ADMISSION NO. 7:**

5 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
6 in full. Further:

7 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
8 the early stages of discovery and particularly because of James P. Spears's failure to cooperate in
9 discovery in this matter.

10 Responding Party objects to this request on the grounds that it seeks information that is neither
11 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

12 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

13 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
14 privileged communications or attorney work-product.

15 Responding Party objects to this request as premature to the extent it seeks expert opinions or
16 testimony.

17 Responding Party objects to the extent the request seeks information outside of Responding
18 Party's possession, custody, and control.

19 Subject to the Preliminary Statement and General Objections, each of which is incorporated
20 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

21 Denied.

22 **REQUEST FOR ADMISSION NO. 8:**

23 Admit you have no evidence to support the contention that: James P. Spears "used his role as
24 conservator to further his own personal and business interests." *See, e.g.*, BRITNEY'S JANUARY
25 2022 FEE PETITION OBJECTIONS at 2:10-12.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 8:**

27 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
28 in full. Further:

1 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
2 the early stages of discovery and particularly because of James P. Spears's failure to cooperate in
3 discovery in this matter.

4 Responding Party objects to this request on the grounds that it seeks information that is neither
5 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

6 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

7 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
8 privileged communications or attorney work-product.

9 Responding Party objects to this request as premature to the extent it seeks expert opinions or
10 testimony.

11 Responding Party objects to the extent that the request seeks information outside of Responding
12 Party's possession, custody, and control, and/or particularly within James P. Spears's possession,
13 custody, and control.

14 **AMENDED RESPONSE TO REQUEST FOR ADMISSION NO. 8:**

15 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
16 in full. Further:

17 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
18 the early stages of discovery and particularly because of James P. Spears's failure to cooperate in
19 discovery in this matter.

20 Responding Party objects to this request on the grounds that it seeks information that is neither
21 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

22 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

23 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
24 privileged communications or attorney work-product.

25 Responding Party objects to this request as premature to the extent it seeks expert opinions or
26 testimony.

27 Responding Party objects to the extent the request seeks information outside of Responding
28 Party's possession, custody, and control.

1 Subject to the Preliminary Statement and General Objections, each of which is incorporated
2 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

3 Denied.

4 **REQUEST FOR ADMISSION NO. 9:**

5 Admit you have no evidence to support the contention that: James P. Spears “ran a surveillance
6 program that contemporaneously captured his daughter’s attorney-client and other communications and
7 included placing a secret listening device in his daughter’s bedroom.” *See, e.g.*, BRITNEY’S
8 JANUARY 2022 FEE PETITION OBJECTIONS at 24:3-5.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 9:**

10 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
11 in full. Further:

12 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
13 the early stages of discovery and particularly because of James P. Spears’s failure to cooperate in
14 discovery in this matter.

15 Responding Party objects to this request on the grounds that it seeks information that is neither
16 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

17 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

18 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
19 privileged communications or attorney work-product.

20 Responding Party objects to this request as premature to the extent it seeks expert opinions or
21 testimony.

22 Responding Party objects to the extent that the request seeks information outside of Responding
23 Party’s possession, custody, and control, and/or particularly within James P. Spears’s possession,
24 custody, and control.

25 **AMENDED RESPONSE TO REQUEST FOR ADMISSION NO. 9:**

26 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
27 in full. Further:

1 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
2 the early stages of discovery and particularly because of James P. Spears's failure to cooperate in
3 discovery in this matter.

4 Responding Party objects to this request on the grounds that it seeks information that is neither
5 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

6 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

7 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
8 privileged communications or attorney work-product.

9 Responding Party objects to this request as premature to the extent it seeks expert opinions or
10 testimony.

11 Responding Party objects to the extent the request seeks information outside of Responding
12 Party's possession, custody, and control.

13 Subject to the Preliminary Statement and General Objections, each of which is incorporated
14 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

15 Denied.

16 **REQUEST FOR ADMISSION NO. 10:**

17 Admit you have no "*prima facie evidence*" supporting your contention that: James P. Spears
18 falls within a "special class of fiduciaries who, as a matter of precedent, never should be given an
19 additional penny." *See, e.g.*, BRITNEY'S JANUARY 2022 FEE PETITION OBJECTIONS at ¶ 10.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 10:**

21 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
22 in full. Further:

23 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
24 the early stages of discovery and particularly because of James P. Spears's failure to cooperate in
25 discovery in this matter.

26 Responding Party objects to this request on the grounds that it seeks information that is neither
27 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

28 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

1 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
2 privileged communications or attorney work-product.

3 Responding Party objects to this request as premature to the extent it seeks expert opinions or
4 testimony.

5 Responding Party objects to the extent that the request seeks information outside of Responding
6 Party's possession, custody, and control, and/or particularly within James P. Spears's possession,
7 custody, and control.

8 **AMENDED RESPONSE TO REQUEST FOR ADMISSION NO. 10:**

9 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
10 in full. Further:

11 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
12 the early stages of discovery and particularly because of James P. Spears's failure to cooperate in
13 discovery in this matter.

14 Responding Party objects to this request on the grounds that it seeks information that is neither
15 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

16 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

17 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
18 privileged communications or attorney work-product.

19 Responding Party objects to this request as premature to the extent it seeks expert opinions or
20 testimony.

21 Responding Party objects to the extent the request seeks information outside of Responding
22 Party's possession, custody, and control.

23 Subject to the Preliminary Statement and General Objections, each of which is incorporated
24 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

25 Denied.

26 **REQUEST FOR ADMISSION NO. 11:**

27 Admit James P. Spears did not force or otherwise cause you to take Lithium. *See, e.g.,*
28 BRITNEY'S JANUARY 2022 FEE PETITION OBJECTIONS at ¶ 11.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

2 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
3 in full. Further:

4 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
5 the early stages of discovery and particularly because of James P. Spears's failure to cooperate in
6 discovery in this matter.

7 Responding Party objects to this request on the grounds that it seeks information that is neither
8 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

9 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

10 Responding Party objects to this request as premature to the extent it seeks expert opinions or
11 testimony.

12 Responding Party objects to the extent that the request seeks information outside of Responding
13 Party's possession, custody, and control, and/or particularly within James P. Spears's possession,
14 custody, and control.

15 Responding Party objects to the extent that the request seeks to invade Responding Party's right
16 of privacy.

17 Responding Party objects that the request is vague and ambiguous as to the undefined phrase
18 "force or otherwise cause."

19 **AMENDED RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

20 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
21 in full. Further:

22 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
23 the early stages of discovery and particularly because of James P. Spears's failure to cooperate in
24 discovery in this matter.

25 Responding Party objects to this request on the grounds that it seeks information that is neither
26 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

27 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

28 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-

1 privileged communications or attorney work-product.

2 Responding Party objects to this request as premature to the extent it seeks expert opinions or
3 testimony.

4 Responding Party objects to the extent the request seeks information outside of Responding
5 Party's possession, custody, and control.

6 Responding Party objects to the extent that the request seeks to invade Responding Party's right
7 of privacy.

8 Responding Party objects that the request is vague and ambiguous as to the undefined phrase
9 "force or otherwise cause."

10 Subject to the Preliminary Statement and General Objections, each of which is incorporated
11 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

12 Denied.

13 **REQUEST FOR ADMISSION NO. 12:**

14 Admit you have no evidence to support the contention that: James P. Spears "instructed Black
15 Box to place a secret recording device in Ms. Spears's bedroom." *See, e.g.,* BRITNEY'S
16 JANUARY 2022 FEE PETITION OBJECTIONS at ¶ 67.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 12:**

18 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
19 in full. Further:

20 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
21 the early stages of discovery and particularly because of James P. Spears's failure to cooperate in
22 discovery in this matter.

23 Responding Party objects to this request on the grounds that it seeks information that is neither
24 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

25 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

26 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
27 privileged communications or attorney work-product.

1 Responding Party objects to this request as premature to the extent it seeks expert opinions or
2 testimony.

3 Responding Party objects to the extent that the request seeks information outside of Responding
4 Party's possession, custody, and control, and/or particularly within James P. Spears's possession,
5 custody, and control.

6 **AMENDED RESPONSE TO REQUEST FOR ADMISSION NO. 12:**

7 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
8 in full. Further:

9 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
10 the early stages of discovery and particularly because of James P. Spears's failure to cooperate in
11 discovery in this matter.

12 Responding Party objects to this request on the grounds that it seeks information that is neither
13 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

14 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

15 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
16 privileged communications or attorney work-product.

17 Responding Party objects to this request as premature to the extent it seeks expert opinions or
18 testimony.

19 Responding Party objects to the extent the request seeks information outside of Responding
20 Party's possession, custody, and control.

21 Subject to the Preliminary Statement and General Objections, each of which is incorporated
22 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

23 Denied.

24 **REQUEST FOR ADMISSION NO. 13:**

25 Admit you have no evidence to support the contention that: James P. Spears engaged in "self-
26 dealing on Britney's childhood home." *See, e.g.,* BRITNEY'S JANUARY 2022 FEE PETITION
27 OBJECTIONS at ¶¶ 81-83.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 13:**

2 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
3 in full. Further:

4 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
5 the early stages of discovery and particularly because of James P. Spears's failure to cooperate in
6 discovery in this matter.

7 Responding Party objects to this request on the grounds that it seeks information that is neither
8 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

9 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

10 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
11 privileged communications or attorney work-product.

12 Responding Party objects to this request as premature to the extent it seeks expert opinions or
13 testimony.

14 Responding Party objects to the extent that the request seeks information outside of Responding
15 Party's possession, custody, and control, and/or particularly within James P. Spears's possession,
16 custody, and control.

17 **AMENDED RESPONSE TO REQUEST FOR ADMISSION NO. 13:**

18 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
19 in full. Further:

20 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
21 the early stages of discovery and particularly because of James P. Spears's failure to cooperate in
22 discovery in this matter.

23 Responding Party objects to this request on the grounds that it seeks information that is neither
24 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

25 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

26 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
27 privileged communications or attorney work-product.

1 Responding Party objects to this request as premature to the extent it seeks expert opinions or
2 testimony.

3 Responding Party objects to the extent the request seeks information outside of Responding
4 Party's possession, custody, and control.

5 Subject to the Preliminary Statement and General Objections, each of which is incorporated
6 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

7 Denied.

8 **REQUEST FOR ADMISSION NO. 14:**

9 Admit you have no evidence to support the contention that: James P. Spears "exploited his role
10 as Conservator to prevail upon Ms. Spears's tour staff to help him turn his catering business into a
11 Hollywood career." *See, e.g.*, BRITNEY'S JANUARY 2022 FEE PETITION OBJECTIONS at ¶ 89.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 14:**

13 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
14 in full. Further:

15 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
16 the early stages of discovery and particularly because of James P. Spears's failure to cooperate in
17 discovery in this matter.

18 Responding Party objects to this request on the grounds that it seeks information that is neither
19 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

20 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

21 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
22 privileged communications or attorney work-product.

23 Responding Party objects to this request as premature to the extent it seeks expert opinions or
24 testimony.

25 Responding Party objects to the extent that the request seeks information outside of Responding
26 Party's possession, custody, and control, and/or particularly within James P. Spears's possession,
27 custody, and control.

1 **AMENDED RESPONSE TO REQUEST FOR ADMISSION NO. 14:**

2 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
3 in full. Further:

4 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
5 the early stages of discovery and particularly because of James P. Spears's failure to cooperate in
6 discovery in this matter.

7 Responding Party objects to this request on the grounds that it seeks information that is neither
8 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

9 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

10 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
11 privileged communications or attorney work-product.

12 Responding Party objects to this request as premature to the extent it seeks expert opinions or
13 testimony.

14 Responding Party objects to the extent the request seeks information outside of Responding
15 Party's possession, custody, and control.

16 Subject to the Preliminary Statement and General Objections, each of which is incorporated
17 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

18 Denied.

19 **REQUEST FOR ADMISSION NO. 15:**

20 Admit you have no evidence to support the contention that: James P. Spears "has done
21 reprehensible things to [you], even as he enriched himself." *See, e.g.,* BRITNEY'S JANUARY 2022
22 FEE PETITION OBJECTIONS at ¶ 96.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 15:**

24 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
25 in full. Further:

26 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
27 the early stages of discovery and particularly because of James P. Spears's failure to cooperate in
28 discovery in this matter.

1 Responding Party objects to this request on the grounds that it seeks information that is neither
2 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

3 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

4 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
5 privileged communications or attorney work-product.

6 Responding Party objects to this request as premature to the extent it seeks expert opinions or
7 testimony.

8 Responding Party objects to the extent that the request seeks information outside of Responding
9 Party's possession, custody, and control, and/or particularly within James P. Spears's possession,
10 custody, and control.

11 **AMENDED RESPONSE TO REQUEST FOR ADMISSION NO. 15:**

12 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
13 in full. Further:

14 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
15 the early stages of discovery and particularly because of James P. Spears's failure to cooperate in
16 discovery in this matter.

17 Responding Party objects to this request on the grounds that it seeks information that is neither
18 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

19 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

20 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
21 privileged communications or attorney work-product.

22 Responding Party objects to this request as premature to the extent it seeks expert opinions or
23 testimony.

24 Responding Party objects to the extent the request seeks information outside of Responding
25 Party's possession, custody, and control.

26 Subject to the Preliminary Statement and General Objections, each of which is incorporated
27 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

28 Denied.

1 **REQUEST FOR ADMISSION NO. 16:**

2 Admit you have no evidence to support any contention of “mismanagement concerning
3 excessive fees and expenses incurred at Britney’s Louisiana Residence.” *See, e.g.,* BRITNEY’S
4 JANUARY 2022 FEE PETITION OBJECTIONS at 32 n.17.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 16:**

6 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
7 in full. Further:

8 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
9 the early stages of discovery and particularly because of James P. Spears’s failure to cooperate in
10 discovery in this matter.

11 Responding Party objects to this request on the grounds that it seeks information that is neither
12 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

13 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

14 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
15 privileged communications or attorney work-product.

16 Responding Party objects to this request as premature to the extent it seeks expert opinions or
17 testimony.

18 Responding Party objects to the extent that the request seeks information outside of Responding
19 Party’s possession, custody, and control, and/or particularly within James P. Spears’s possession,
20 custody, and control.

21 **AMENDED RESPONSE TO REQUEST FOR ADMISSION NO. 16:**

22 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
23 in full. Further:

24 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
25 the early stages of discovery and particularly because of James P. Spears’s failure to cooperate in
26 discovery in this matter.

27 Responding Party objects to this request on the grounds that it seeks information that is neither
28 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

1 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

2 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
3 privileged communications or attorney work-product.

4 Responding Party objects to this request as premature to the extent it seeks expert opinions or
5 testimony.

6 Responding Party objects to the extent the request seeks information outside of Responding
7 Party's possession, custody, and control.

8 Subject to the Preliminary Statement and General Objections, each of which is incorporated
9 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

10 Denied.

11 **REQUEST FOR ADMISSION NO. 18:**

12 Admit that the Court in Los Angeles Superior Court case number BP108870 issued an order on
13 February 13, 2009 authorizing James P. Spears to obtain your text messages pursuant to the Stored
14 Communications Act, 18 U.S.C. § 2701 *et seq.*

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 18:**

16 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
17 in full. Further:

18 Responding Party objects to this request on the grounds that it seeks information that is neither
19 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

20 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

21 Responding Party objects to this request as premature to the extent it seeks expert opinions or
22 testimony.

23 Responding Party objects that the request is compound.

24 Responding Party objects that the request is vague, ambiguous, oppressive, and provides
25 incomplete information, such that a fair and reasoned response cannot be prepared without additional
26 context.

1 **AMENDED RESPONSE TO REQUEST FOR ADMISSION NO. 18:**

2 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
3 in full. Further:

4 Responding Party objects to this request on the grounds that it seeks information that is neither
5 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

6 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

7 Responding Party objects to this request as premature to the extent it seeks expert opinions or
8 testimony.

9 Responding Party objects that the request is compound.

10 Responding Party objects that the request is vague, ambiguous, oppressive, misleading, and
11 provides incomplete information as to the term “obtain,” such that a fair and reasoned response cannot
12 be prepared without additional context, and further, as Mr. Spears knows, he did not have authorization
13 to intercept or monitor text messages, contemporaneously and in real time, which according to the
14 evidence, the allegations of the Black Box Security whistleblower as corroborated by *The New York*
15 *Times*, and the corroboration of former FBI Special Agent Sherine Ebadi, is what occurred. As
16 Ms. Ebadi’s Declaration provides, Black Box purchased an iPad, which was then linked to Ms. Spears’s
17 iCloud account, allowing the contents of Ms. Spears’s iPhone, which was backed up to the cloud, to be
18 simultaneously accessed and reviewed from the iPad. The iPad was kept in a safe in Black Box’s
19 offices. Messrs. Yemini and/or others would regularly review the iPad’s contents, *e.g.*, text messages,
20 videos, and other personal data mirrored from Ms. Spears’s iPhone, and they would generally put the
21 data in encrypted folders before sending them to Mr. Spears for his review. (Ebadi Decl. ¶ 30.) This
22 conduct, among other conduct, was well outside the scope of the above-referenced document as that
23 document did not authorize or allow Mr. Spears or others to monitor, intercept, or review text messages
24 (much less those between Ms. Spears and her counsel)—contemporaneously and in real time. *See* 18
25 U.S.C. § 2511 *et seq.* and 18 U.S.C. § 2701(a) *et seq.* (Ebadi Decl. ¶ 36.)

26 Subject to the above, the Preliminary Statement and General Objections, each of which is
27 incorporated herein as though set forth in full, and the foregoing, Responding Party responds as follows:
28

1 Denied insofar as the above-referenced document did not “authorize” James P. Spears to engage
2 in the conduct at issue.

3 **REQUEST FOR ADMISSION NO. 19:**

4 Admit you have no evidence of James P. Spears misappropriating any conservatorship assets.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 19:**

6 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
7 in full. Further:

8 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
9 the early stages of discovery and particularly because of James P. Spears’s failure to cooperate in
10 discovery in this matter.

11 Responding Party objects to this request on the grounds that it seeks information that is neither
12 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

13 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

14 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
15 privileged communications or attorney work-product.

16 Responding Party objects to this request as premature to the extent it seeks expert opinions or
17 testimony.

18 Responding Party objects to the extent that the request seeks information outside of Responding
19 Party’s possession, custody, and control, and/or particularly within James P. Spears’s possession,
20 custody, and control.

21 Responding Party objects the request is vague and ambiguous as to the undefined terms
22 “misappropriating” and “conservatorship assets.”

23 **AMENDED RESPONSE TO REQUEST FOR ADMISSION NO. 19:**

24 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
25 in full. Further:

26 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
27 the early stages of discovery and particularly because of James P. Spears’s failure to cooperate in
28 discovery in this matter.

1 Responding Party objects to this request on the grounds that it seeks information that is neither
2 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

3 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

4 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
5 privileged communications or attorney work-product.

6 Responding Party objects to this request as premature to the extent it seeks expert opinions or
7 testimony.

8 Responding Party objects to the extent the request seeks information outside of Responding
9 Party's possession, custody, and control.

10 Responding Party objects the request is vague and ambiguous as to the undefined terms
11 "misappropriating" and "conservatorship assets."

12 Subject to the Preliminary Statement and General Objections, each of which is incorporated
13 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

14 Denied.

15 **REQUEST FOR ADMISSION NO. 20:**

16 Admit you have no evidence of James P. Spears exploiting you for his personal gain.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 20:**

18 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
19 in full. Further:

20 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
21 the early stages of discovery and particularly because of James P. Spears's failure to cooperate in
22 discovery in this matter.

23 Responding Party objects to this request on the grounds that it seeks information that is neither
24 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

25 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

26 Responding Party objects to this request as premature to the extent it seeks expert opinions or
27 testimony.

1 Responding Party objects to the extent that the request seeks information outside of Responding
2 Party's possession, custody, and control, and/or particularly within James P. Spears's possession,
3 custody, and control.

4 Responding Party objects the request is vague and ambiguous as to the undefined terms
5 "exploiting" and "personal gain."

6 **AMENDED RESPONSE TO REQUEST FOR ADMISSION NO. 20:**

7 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
8 in full. Further:

9 Responding Party objects that the request is vague, ambiguous, oppressive, and premature, given
10 the early stages of discovery and particularly because of James P. Spears's failure to cooperate in
11 discovery in this matter.

12 Responding Party objects to this request on the grounds that it seeks information that is neither
13 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

14 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

15 Responding Party objects to this request to the extent it seeks to uncover the content of attorney-
16 privileged communications or attorney work-product.

17 Responding Party objects to this request as premature to the extent it seeks expert opinions or
18 testimony.

19 Responding Party objects to the extent the request seeks information outside of Responding
20 Party's possession, custody, and control.

21 Responding Party objects the request is vague and ambiguous as to the undefined terms
22 "exploiting" and "personal gain."

23 Subject to the Preliminary Statement and General Objections, each of which is incorporated
24 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

25 Denied.

26 **REQUEST FOR ADMISSION NO. 21:**

27 Admit that all eleven accountings filed in Los Angeles Superior Court case number BP108870
28 through August 13, 2019 were reviewed and approved by the Court.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 21:**

2 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
3 in full. Further:

4 Responding Party objects to this request on the grounds that it seeks information that is neither
5 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

6 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

7 Responding Party objects to this request as premature to the extent it seeks expert opinions or
8 testimony.

9 Responding Party objects that the request is compound.

10 Responding Party objects that the request is vague, ambiguous, oppressive, and provides
11 incomplete information, such that a fair and reasoned response cannot be prepared without additional
12 context.

13 **AMENDED RESPONSE TO REQUEST FOR ADMISSION NO. 21:**

14 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
15 in full. Further:

16 Responding Party objects to this request on the grounds that it seeks information that is neither
17 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

18 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

19 Responding Party objects to this request as premature to the extent it seeks expert opinions or
20 testimony.

21 Responding Party objects that the request is compound.

22 Responding Party objects that the request is vague, ambiguous, oppressive, and provides
23 incomplete information, such that a fair and reasoned response cannot be prepared without additional
24 context.

25 Subject to the Preliminary Statement and General Objections, each of which is incorporated
26 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

27 Admitted that the referenced accountings may have been or were “approved” by the Court, but
28 such “approvals” were based upon the information provided to the Court by James P. Spears or others,

1 and not concealed from the Court by James P. Spears or others, in violation of common law principles
2 of fraud, his legal and fiduciary duties, and in violation of *Hudson v. Foster*.

3 **REQUEST FOR ADMISSION NO. 22:**

4 Admit that neither you nor your Court Appointed Counsel objected to any of the eleven
5 accountings filed in Los Angeles Superior Court case number BP108870 through August 13, 2019.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 22:**

7 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
8 in full. Further:

9 Responding Party objects to this request on the grounds that it seeks information that is neither
10 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

11 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

12 Responding Party objects to this request as premature to the extent it seeks expert opinions or
13 testimony.

14 Responding Party objects that the request is compound.

15 Responding Party objects that the request is vague, ambiguous, oppressive, and provides
16 incomplete information, such that a fair and reasoned response cannot be prepared without additional
17 context.

18 **AMENDED RESPONSE TO REQUEST FOR ADMISSION NO. 22:**

19 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
20 in full. Further:

21 Responding Party objects to this request on the grounds that it seeks information that is neither
22 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

23 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

24 Responding Party objects to this request as premature to the extent it seeks expert opinions or
25 testimony.

26 Responding Party objects that the request is compound.
27
28

1 Responding Party objects that the request is vague, ambiguous, oppressive, and provides
2 incomplete information, such that a fair and reasoned response cannot be prepared without additional
3 context.

4 Subject to the Preliminary Statement and General Objections, each of which is incorporated
5 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

6 Admitted that no objections were filed to the first eleven accountings of James P. Spears, but any
7 failure to object is based upon the premise that Ms. Spears was provided with an opportunity to object
8 and was based upon reasonable or justifiable reliance upon the information provided to, and not
9 concealed from, the Court by Mr. Spears and his counsel.

10 **REQUEST FOR ADMISSION NO. 23:**

11 Admit you have no evidence of any inaccuracies or improprieties contained in any of the eleven
12 accountings filed in Los Angeles Superior Court case number BP108870 through August 13, 2019.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 23:**

14 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
15 in full. Further:

16 Responding Party objects to this request on the grounds that it seeks information that is neither
17 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

18 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

19 Responding Party objects to this request as premature to the extent it seeks expert opinions or
20 testimony.

21 Responding Party objects that the request is compound.

22 Responding Party objects that the request is vague, ambiguous, oppressive, and provides
23 incomplete information, such that a fair and reasoned response cannot be prepared without additional
24 context.

25 Responding Party objects that the request is vague and ambiguous as to the undefined terms
26 “inaccuracies” and “improprieties.”
27
28

1 **AMENDED RESPONSE TO REQUEST FOR ADMISSION NO. 23:**

2 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
3 in full. Further:

4 Responding Party objects to this request on the grounds that it seeks information that is neither
5 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

6 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

7 Responding Party objects to this request as premature to the extent it seeks expert opinions or
8 testimony.

9 Responding Party objects that the request is compound.

10 Responding Party objects that the request is vague, ambiguous, oppressive, and provides
11 incomplete information, such that a fair and reasoned response cannot be prepared without additional
12 context.

13 Responding Party objects that the request is vague and ambiguous as to the undefined terms
14 “inaccuracies” and “improprieties.”

15 Subject to the Preliminary Statement and General Objections, each of which is incorporated
16 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

17 Denied.

18 **REQUEST FOR ADMISSION NO. 24:**

19 Admit you have no evidence of any inaccuracies or improprieties contained in the Twelfth
20 Account Current; Report of James P. Spears, Conservator Of The Estate; Petition For Its Settlement And
21 Approval Thereof filed August 6, 2020 in Los Angeles Superior Court case number BP108870 other
22 than what is alleged in Britney Jean Spears’s Objections And Opposition To James P. Spears’s Petition
23 For Order Confirming, Authorizing, And Instructing Payment On Account Of James P. Spears’s
24 Attorneys’ Fees From The Estate Or Britney Jean Spears filed January 14, 2022 in Los Angeles
25 Superior Court case number BP108870.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 24:**

27 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
28 in full. Further:

1 Responding Party objects to this request on the grounds that it seeks information that is neither
2 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

3 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

4 Responding Party objects to this request as premature to the extent it seeks expert opinions or
5 testimony.

6 Responding Party objects that the request is compound.

7 Responding Party objects that the request is vague, ambiguous, oppressive, and provides
8 incomplete information, such that a fair and reasoned response cannot be prepared without additional
9 context.

10 Responding Party objects that the request is vague and ambiguous as to the undefined terms
11 “inaccuracies” and “improprieties.”

12 **AMENDED RESPONSE TO REQUEST FOR ADMISSION NO. 24:**

13 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
14 in full. Further:

15 Responding Party objects to this request on the grounds that it seeks information that is neither
16 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

17 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

18 Responding Party objects to this request as premature to the extent it seeks expert opinions or
19 testimony.

20 Responding Party objects that the request is compound.

21 Responding Party objects that the request is vague, ambiguous, oppressive, and provides
22 incomplete information, such that a fair and reasoned response cannot be prepared without additional
23 context.

24 Responding Party objects that the request is vague and ambiguous as to the undefined terms
25 “inaccuracies” and “improprieties.”

26 Subject to the Preliminary Statement and General Objections, each of which is incorporated
27 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

28 Denied.

1 **REQUEST FOR ADMISSION NO. 25:**

2 Admit that all attorney's fees and legal services incurred by James P. Spears and paid from your
3 Estate from the inception of the Conservatorship of the Person and the Estate of Britney Jean Spears
4 through October 31, 2019 were reviewed and approved by the Court in Los Angeles Superior Court case
5 number BP108870.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 25:**

7 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
8 in full. Further:

9 Responding Party objects to this request on the grounds that it seeks information that is neither
10 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

11 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

12 Responding Party objects to this request as premature to the extent it seeks expert opinions or
13 testimony.

14 Responding Party objects that the request is compound.

15 Responding Party objects that the request is vague, ambiguous, oppressive, and provides
16 incomplete information, such that a fair and reasoned response cannot be prepared without additional
17 context.

18 **AMENDED RESPONSE TO REQUEST FOR ADMISSION NO. 25:**

19 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
20 in full. Further:

21 Responding Party objects to this request on the grounds that it seeks information that is neither
22 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

23 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

24 Responding Party objects to this request as premature to the extent it seeks expert opinions or
25 testimony.

26 Responding Party objects that the request is compound.
27
28

1 Responding Party objects that the request is vague, ambiguous, oppressive, and provides
2 incomplete information, such that a fair and reasoned response cannot be prepared without additional
3 context.

4 Subject to the Preliminary Statement and General Objections, each of which is incorporated
5 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

6 Admitted that no objections were filed to the first eleven accountings of James P. Spears, but any
7 failure to object is based upon the premise that Ms. Spears was provided with an opportunity to object
8 and was based upon reasonable or justifiable reliance upon the information provided to, and not
9 concealed from, the Court by Mr. Spears and his counsel.

10 **REQUEST FOR ADMISSION NO. 26:**

11 Admit that all compensation for services James P. Spears rendered as Conservator of the Estate
12 of Britney Jean Spears and paid from your Estate from the inception of the Conservatorship of the
13 Person and the Estate of Britney Jean Spears through October 31, 2019 was reviewed and approved by
14 the Court in Los Angeles Superior Court case number BP108870.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 26:**

16 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
17 in full. Further:

18 Responding Party objects to this request on the grounds that it seeks information that is neither
19 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

20 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

21 Responding Party objects to this request as premature to the extent it seeks expert opinions or
22 testimony.

23 Responding Party objects that the request is compound.

24 Responding Party objects that the request is vague, ambiguous, oppressive, and provides
25 incomplete information, such that a fair and reasoned response cannot be prepared without additional
26 context.

27 Responding Party objects that the request is vague and ambiguous as to the undefined terms
28 “compensation,” “services,” and “rendered.”

1 **AMENDED RESPONSE TO REQUEST FOR ADMISSION NO. 26:**

2 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
3 in full. Further:

4 Responding Party objects to this request on the grounds that it seeks information that is neither
5 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

6 Responding Party objects to the extent the request seeks a legal conclusion or opinion.

7 Responding Party objects to this request as premature to the extent it seeks expert opinions or
8 testimony.

9 Responding Party objects that the request is compound.

10 Responding Party objects that the request is vague, ambiguous, oppressive, and provides
11 incomplete information, such that a fair and reasoned response cannot be prepared without additional
12 context.

13 Responding Party objects that the request is vague and ambiguous as to the undefined terms
14 “compensation,” “services,” and “rendered.”

15 Subject to the Preliminary Statement and General Objections, each of which is incorporated
16 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

17 Admitted that no objections were filed to the first eleven accountings of James P. Spears, but any
18 failure to object is based upon the premise that Ms. Spears was provided with an opportunity to object
19 and was based upon reasonable or justifiable reliance upon the information provided to, and not
20 concealed from, the Court by Mr. Spears and his counsel.

21
22 DATED: June 14, 2022

GREENBERG TRAURIG, LLP

23
24 By /s/ Mathew S. Rosengart

25 Mathew S. Rosengart

26 Attorneys for Britney Jean Spears
27
28

1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA**

3 **COUNTY OF LOS ANGELES**

4 I am employed in the aforesaid county, State of California; I am over the age of 18 years and not a
5 party to the within action; my business address is **1840 Century Park East, Suite 1900, Los Angeles,**
6 **CA 90067-2121.**

7 On June 14, 2022, I caused the document described as **BRITNEY JEAN SPEARS'S FIRST**
8 **AMENDED RESPONSES TO JAMES P. SPEARS'S FIRST SET OF REQUESTS FOR**
9 **ADMISSION** to be transmitted to the addressee(s) listed on the attached Service List:

10 ☒ **(BY E-SERVICE)** I caused the document(s) to be sent to the person(s) at the e-mail address(es)
11 indicated on the attached service list.

12 ☒ **(STATE)** I declare under penalty of perjury under the laws of the State of California that the
13 foregoing is true and correct.

14 Executed on June 14, 2022, at Los Angeles, California.

15 /s/ Heather J. Silver
16 Heather J. Silver
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SERVICE LIST
CASE BP108870

Alex Weingarten Willkie Farr & Gallagher, LLP 2029 Century Park East, Suite 400 Los Angeles, CA 90067 Email; aweingarten@willkie.com ebakewell@willkie.com Tel: 310-855-3000/Fax: 310-855-3099	Attorneys for James P. Spears Suspended Conservator of the Estate
Vivian L. Thoreen Jonathan H. Park HOLLAND & KNIGHT, LLP 400 S. Hope Street, 8th Floor Los Angeles, CA 90071 Tel: 213-896-2400/ Fax: 213-896-2450 Email: vivian.thoreen@hklaw.com jonathan.park@hklaw.com	Former Attorneys for James P. Spears, Suspended Conservator of the Estate
Geraldine A. Wyle Jeryll S. Cohen FREEMAN FREEMAN & SMILEY, LLP 1888 Century Park East, Suite 1500 Los Angeles, CA 90067 Email: Geraldine.wyle@ffslaw.com Jeryll.cohen@ffslaw.com	Former Attorneys for James P. Spears, Suspended Conservator of the Estate
Yasha Bronshteyn GINZBURG & BRONSHTEYN, LLP 11111 Santa Monica Blvd., Suite. 1840 Los Angeles CA 90025 Tel: 310-914-3222 Email: yasha@gblp-law.com	Attorneys for Lynne Spears, Mother of Former Conservatee
Gladstone N. Jones, III Lynn E. Swanson JONES SWANSON HUDDALL & GARRISON, LLC Pan-American Life Center 601 Poydras Street, Suite 2655 New Orleans, LA 70130 Tel: 504-523-2500 Email: gjones@jonesswanson.com; lswanson@jonesswanson.com	Attorneys for Lynne Spears, Mother of Former Conservatee

Lauriann C. Wright Marie Mondia WRIGHT KIM DOUGLAS, ALC 130 S. Jackson Street Glendale, CA 91205-1123 Tel: 626-356-3900 Email: lauriann@wkdlegal.com marie@wkdlegal.com	Attorneys for Jodi Montgomery
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Amended Responses to Special Interrogatories

GREENBERG TRAURIG, LLP

MATHEW S. ROSENGART (SBN 255750) (*RosengartM@gtlaw.com*)

SCOTT D. BERTZYK (SBN 116449) (*Bertzys@gtlaw.com*)

LISA C. MCCURDY (SBN 228755) (*McCurdyL@gtlaw.com*)

MATTHEW R. GERSHMAN (SBN 253031) (*GershmanM@gtlaw.com*)

1840 Century Park East, Suite 1900

Los Angeles, CA 90067-2121

Tel: 310-586-7700

Fax: 310-586-7800

Attorneys for Britney Jean Spears

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES, CENTRAL DISTRICT

In re the Conservatorship of the Person and
Estate of BRITNEY JEAN SPEARS

Case No. BP1008870

Hon. Brenda J. Penny, Dept. 4

**BRITNEY JEAN SPEARS'S FIRST
AMENDED RESPONSE TO FIRST SET
OF SPECIAL INTERROGATORIES
FROM JAMES P. SPEARS**

PROPOUNDING PARTY: JAMES P. SPEARS

RESPONDING PARTY: BRITNEY JEAN SPEARS

SET NO. ONE

1 Britney Jean Spears (“Responding Party”) provides these amended responses and objections to
2 James P. Spears’s First Set of Special Interrogatories as follows:

3 **PRELIMINARY STATEMENT**

4 On July 26, 2021, Britney Spears, through the undersigned counsel, filed her Verified Petition
5 for Suspension and Removal of James P. Spears as Conservator of the Estate. After extensive briefing
6 and argument and a lengthy hearing, on September 29, 2021, the Court suspended James P. Spears,
7 determining that the conservatorship he had run was “toxic” and that the suspension of Mr. Spears was
8 proper and in the best interests of the conservatee. Thus, after enduring a 13-plus year conservatorship,
9 from which Mr. Spears enriched himself by reaping at least \$6 million in salary, fees, and
10 commissions—even though he was not a talent representative, but was instead supposed to have been
11 serving as a fiduciary—Britney Spears was set free. Regrettably, rather than letting her live her life and
12 moving on, Mr. Spears has nevertheless continued to importune, seeking to harass and bully his
13 daughter, including in connection with improper, abusive discovery involving *145 document requests*
14 *alone*.

15 Mr. Spears expressly placed his misconduct at issue in his December 15, 2021 fee petition, and
16 all of the facts surrounding his misconduct are within his possession, custody, and control. This is not a
17 game, and he should stop treating it like one. He should fulfill his final fiduciary duties, act like a
18 fiduciary (if not a decent father), and move on. What is all the more disgraceful is that Mr. Spears has
19 failed to search for or produce any text messages concerning his patent and potentially-criminal
20 misconduct (which he placed directly at issue in this case); has failed to comply with his written
21 discovery obligations (instead issuing boilerplate, blanket objections); and has inexcusably evaded his
22 deposition for eight months—even as he falsely claimed he “has nothing to hide” and would therefore
23 “hide nothing” and that he would act with “unconditional” cooperation and transparency.

24 Although he has repeatedly and discordantly referred to himself as a “loving father”—indeed, he
25 and his counsel spent substantial conservatorship funds (*Britney Spears’s funds*) on a media tour to try,
26 with futility, to convey such an image—the evidence of abuses endured by Ms. Spears under the
27 conservatorship imposed by her father and kept in place for well over a decade, is manifest. He knows
28 this. The abusive discovery he purports to have propounded further proves this point.

1 While enriching himself from the conservatorship, making himself a multi-millionaire at his
2 daughter's expense on the heels of his admitted alcohol abuse, lack of a career, and long history of
3 financial mismanagement, including tax liens, mortgage defaults, failed business ventures, and a
4 Chapter 7 bankruptcy, Mr. Spears stripped his daughter of fundamental liberties, worked his daughter to
5 the point of exhaustion, and ran a toxic conservatorship that was borne of, and seriously tainted by,
6 significant conflicts of interest in violation of, among other things, the California Rules of Court. *See*
7 Cal. R. Ct. No. 7.1059, *et seq.* ("Standards of conduct for the conservator of the estate").

8 By way of brief illustration only, Mr. Spears admittedly borrowed substantial monies from Tri
9 Star Sports & Entertainment ("Tri Star") shortly before placing his daughter into the conservatorship
10 and then (despite her supposed incapacity), he sent her on a grueling 97-show international tour and
11 onto other work from which he and others obtained millions of dollars. As Anthony Palmieri, President
12 of the National Guardianship Association, an organization representing conservators, recently stated,
13 "[t]he existence of the Tri Star loan . . . is troubling." "It makes me wonder where the allegiance lies. Is
14 the conservator making decisions in the best interest of the conservatee or the business manager who
15 they owe a debt to? ***It reeks of conflict of interest***" (emphasis added).¹ *See also* California Rules of
16 Court governing conservators, Cal. R. Ct. No. 7.1059(a) ("The conservator must avoid actual conflicts
17 of interest and, consistent with his or her fiduciary duty to the conservatee, the appearance of conflicts
18 of interest." Further, "[t]he conservator must avoid any personal, business, or professional interest or
19 relationship that is or reasonably could be perceived as being self-serving or adverse to the best interest
20 of the conservatee"); Cal. R. Ct. No. 7.1059(a) (2)-(4); 7.1059(b).

21 Additionally, as described in *The New York Times*' extensive, detailed reporting, and as further
22 corroborated by ex-FBI Special Agent Sherine Ebadi, Mr. Spears directed or was involved in an intense
23 surveillance operation of his own daughter, which reportedly included placing a secret listening device
24 in her private bedroom and capturing (***in real time and contemporaneously***) her private
25 communications, ***including sacrosanct, privileged communications with her counsel***. In addition to
26 these gross invasions of privacy, as the record demonstrates, Mr. Spears (while acting as Conservator),
27

28 ¹ *See* Liz Day, Emily Steel, Rachel Abrams, and Samantha Stark, *Britney Spears Felt Trapped. Her Business Manager Benefited*, *The New York Times* (Dec. 19, 2021), <https://www.nytimes.com/2021/12/19/business/britney-spears-conservatorship-tri-star.html>.

1 engaged in self-dealing, diversion of conservatorship resources, and misuse of his daughter's funds.
2 During his tenure serving as Conservator, Mr. Spears was also subjected to a Domestic Violence
3 Restraining Order, resulting from allegations of harassment or abuse of his own daughter's child or
4 children.²

5 Although Mr. Spears's breaches of fiduciary duties and other misconduct are obvious, he has
6 repeatedly, falsely claimed that he has "nothing to hide," will "hide nothing," and will "unconditionally
7 cooperate" with counsel, with "complete transparency without conditions."³ He continues to hide and
8 obstruct, however. Among other things, Mr. Spears has now failed no less than three times to appear for
9 his deposition. He has also failed, for numerous months, to answer fundamental questions concerning,
10 among other things, (i) his role in eavesdropping on his daughter, including contemporaneously
11 capturing his daughter's text communications (*including with her attorney*) and the placement of a
12 secret listening device in her private bedroom; (ii) the total fees taken or received by James P. Spears (or
13 any entity in which he had any interest) from Britney Spears or her Estate; (iii) why Ms. Spears's net
14 worth was so "shockingly low" relative to her gross earnings of hundreds of millions of dollars during
15 the past decade, *see Britney Spears' Net Worth Revealed—And It's Shockingly Low Compared to Her*
16 *Pop Peers, Forbes*, Feb. 17, 2021; (iv) all corporate formation documents for all entities created for the
17 purported benefit of Britney Spears or her Estate; and (v) other economic and related questions
18 concerning how Mr. Spears administered the conservatorship he imposed in 2008.

19 Rather than answering these questions and cooperating with Ms. Spears's efforts to obtain
20 relevant, fundamental truthful information and answering questions under oath at deposition, which he
21 is bound to do as a fiduciary (and which he would be obligated to do even if he were *not* a fiduciary), as
22 referenced above, Mr. Spears has harassed and bullied his daughter. By way of illustration, in October
23 2021, Mr. Spears baldly objected to every single discovery request propounded by Ms. Spears. Further,
24

25 ² Instead of seeking to place her into an LPS conservatorship with a higher burden and a statutory framework that presumes
26 that the conservatee's mental health can improve and contains stringent requirements and protections for the conservatee,
27 Mr. Spears placed his daughter into a long-term probate conservatorship generally intended for those with "dementia," whose
28 situations cannot or most likely will not improve, without filing a declaration of incapacity.

³ *See* James P. Spears's November 1, 2021 "Status Report." Pursuant to applicable caselaw, Mr. Spears himself will be
responsible for all legal costs and fees he incurs in connection with these matters.

1 even as he has incongruously failed to appear for deposition or produce documents and information in a
2 timely, organized, Bates labeled, and professional manner (including those that are no longer privileged,
3 post-his September 29, 2021, suspension pursuant to the *Moeller* and *Stine* cases, because the privilege
4 rests not with Mr. Spears, but with the Estate), Mr. Spears has purported to serve on his daughter **145**
5 document requests alone, as well as more than 75 other discovery requests.

6 Mr. Spears's tactics of trying to intimidate, harass, and bully his daughter (even after he was
7 ignominiously suspended by the Court as her Conservator) must cease. Relatedly, his unduly
8 burdensome, irrelevant, and oppressive "discovery" is improper and objectionable for the reasons set
9 forth herein; but as an overriding matter, it is *uniquely* improper and objectionable because Mr. Spears
10 stripped his daughter of civil liberties and grossly invaded her privacy for 13 years. Now that he has
11 been suspended and the conservatorship terminated, his efforts to misuse discovery to even further
12 invade his daughter's privacy simply cannot be countenanced.

13 Even putting this aside, however, perhaps most abusively, and improperly, Mr. Spears has
14 outrageously used his daughter as a pawn, seeking to barter his deposition for hers. Mr. Spears must
15 know (or certainly should know) that any such deposition would be abjectly pointless insofar as this
16 litigation (which *he* commenced) concerns the acts and omissions of Mr. Spears and, thus, all relevant
17 information is uniquely within his possession, custody, and control. Indeed, this unavoidable truth has
18 been discussed at length in meet and confer discussions between counsel; as to Mr. Spears's professed
19 right to inquire into Britney Spears's "claims," Ms. Spears' counsel has made clear time and again that
20 the "claims" to which Mr. Spears refers are not claims of Britney Spears. Instead, those topics flow
21 from the privileged investigation of former FBI Special Agent Sherine Ebadi, the accounts of a former
22 Black Box Security employee and whistleblower, Alex Vlasov, *The New York Times*, and other sources
23 and parties that are *not* Britney Spears. Revealing the true nature of Mr. Spears's desire to depose
24 Britney Spears, Mr. Spears's counsel, in a January 26, 2022 email, expressed Mr. Spears's interest in
25 questioning his daughter regarding "child safety . . . and [possible] drug use," and took the incredible
26 and despicable step of leaking that objective (not a pleading, not a public filing, but an email with that
27 objective) to the press, all to serve his diabolical "strategy" of upsetting his daughter.
28

1 Thus, two things are true: (1) it is evident that Mr. Spears has no shame and will continue his
2 campaign to intimidate and harass his own daughter, including by his efforts to make her sit for a
3 deposition that would have no object other than to harass and upset her (he hopes); and (2) his written
4 discovery served on Ms. Spears is misplaced, targeting “allegations” that are not allegations of Britney
5 Spears and about which there is no legitimate, good faith basis to question her here. Nonetheless,
6 following meet and confer discussions, while reserving all rights, and solely in an effort to avoid
7 unnecessary and costly motion practice, these amended responses are being served. These amended
8 responses do not imply any obligation to provide information and documents in the possession, custody
9 and control of others. Instead, these amended responses demonstrate that there is no legitimate basis for
10 Mr. Spears to pursue his daughter’s deposition. (*See City of King City v. Community Bank of Central*
11 *California*, 131 Cal. App. 4th 913, 933 (2005) (the inquiry focuses on “whether discovery would
12 produce additional admissible evidence”) (emphasis in original); *see also Calcor Space Facility, Inc. v.*
13 *Superior Court*, 53 Cal. App. 4th 216, 223 (1997) (observing that discovery abuse is a “cancer [that] is
14 spreading,” and that, accordingly, judges must be aggressive in curbing it and insisting that discovery be
15 used properly and not as a tactic for improper purposes); *Rifkind v. Superior Court*, 22 Cal. App. 4th
16 1255 (1994) (“If the deposing party ... wants to know what the adverse party is contending, or how it
17 rationalizes the facts a supporting a contention, it may ask that question in an interrogatory”); *Estate of*
18 *Ruchti*, 12 Cal. App. 4th 1593, 1602 (1993) (“other discovery devices less intrusive to the attorney/client
19 privilege and work product protection, such as interrogatories, would have been appropriate”); *Pacific*
20 *Architects Collaborative v. State of Cal.*, 100 Cal. App. 3d 110, 126-127 (1979) (deposition not
21 appropriate where subject matter was not relevant to issues at hand).)

22 * * *

23 The following amended responses and objections are based only upon information presently
24 available to and specifically known by Responding Party. Facts and evidence now known may be
25 imperfectly understood. Additionally, discovery is ongoing in this matter. Accordingly, Responding
26 Party reserves the right to further modify or amend these responses on the basis of subsequently
27 acquired knowledge, information, or understanding. These responses reflect the information that is
28 presently available to Responding Party as derived from such investigation as was possible prior to the

1 date of these responses. Responding Party expressly reserves the right to further amend, add to, delete
2 from, or otherwise modify or supplement each response, to produce documents and/or to make such
3 claims and contentions as may be appropriate when Responding Party has concluded discovery and has
4 ascertained more relevant facts. Except for facts expressly admitted, if any, no incidental or implied
5 admissions are intended or should be construed from any response. The fact that Responding Party
6 provides a response to part or all of any interrogatory is not intended and shall not be construed to be a
7 waiver by Responding Party of all or any part of any objection to such interrogatory. Responding
8 Party's responses are made without waiver of the following rights, and, on the contrary, are intended to
9 preserve and do preserve the following:

10 (i) the right to raise all questions of authenticity, foundation, relevancy, materiality,
11 privilege, and admissibility as evidence for any purpose of the information identified in response to the
12 interrogatories which may arise in any subsequent proceedings in, or trial, if any, of, this or any other
13 action;

14 (ii) the right to object on any ground to the use of said information identified in response to
15 the interrogatories in any subsequent proceeding in, or hearing of, this or any other action;

16 (iii) the right to object on any ground to the introduction into evidence of information
17 identified in response to the interrogatories;

18 (iv) the right to object on any ground at any time to other discovery involving the information
19 provided; and

20 (v) the right to further amend or supplement these responses in the event that any
21 information is unintentionally omitted. Inadvertent identification or production of privileged documents
22 or information by Responding Party is not a waiver of any applicable privilege.

23 This Preliminary Statement is incorporated into each response set forth below.

24 **GENERAL OBJECTIONS**

25 1. Responding Party objects to each interrogatory to the extent it invades the attorney-client
26 privilege, the attorney work product doctrine, and/or any other applicable privilege or immunity.

27 2. Responding Party objects to each interrogatory to the extent it is vague, ambiguous,
28 overbroad, unduly burdensome, oppressive, irrelevant, or not proportional to the needs of the case.

1 3. Responding Party objects to each interrogatory to the extent it seeks information and/or
2 the identification or production of documents not within Responding Party's possession, custody, or
3 control.

4 4. Responding Party objects to each interrogatory to the extent it attempts or purports to
5 impose obligations beyond those created by the Code of Civil Procedure or to provide a response for or
6 on behalf of any other person or entity.

7 5. Responding Party objects to each interrogatory to the extent it seeks information and/or
8 the identification or production of documents which are publicly available and/or uniquely or equally
9 available to James P. Spears.

10 6. Responding Party objects to each interrogatory to the extent that it calls for the
11 production of proprietary, trade secret, and/or commercially sensitive information, or the personal or
12 confidential information of third parties.

13 7. Responding Party objects to each interrogatory to the extent it seeks information based
14 on electronically stored information (ESI), the recovery or restoration of which is unduly burdensome
15 and expensive.

16 8. Responding Party objects to each interrogatory to the extent the discovery sought is not
17 relevant to any matters before the court, nor reasonably calculated to lead to the discovery of admissible
18 evidence regarding those matters.

19 9. Responding Party objects to each interrogatory to the extent the timeframe at issue in the
20 interrogatories is vague, ambiguous and/or unduly burdensome.

21 These General Objections are incorporated into each response set forth below.

22 **RESPONSES TO SPECIAL INTERROGATORIES**

23 **SPECIAL INTERROGATORY NO. 1:**

24 Identify all persons (by name, phone number, and address) likely to have discoverable
25 information — along with the subjects of that information — that you may use to support your claims
26 and defenses in this action.

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 1:**

2 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
3 in full. Further:

4 Responding Party objects that the interrogatory is vague and ambiguous as to the undefined
5 phrase “claims and defenses in this action,” particularly given that there are no complaints or counter-
6 claims pending at this time.

7 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
8 burdensome, and calling for speculation regarding what information third parties are “likely to have”
9 “along with the subjects of that information.”

10 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion,
11 including as to what constitutes “discoverable information.”

12 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
13 attorney-privileged communications or attorney work-product.

14 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
15 burdensome, oppressive, and premature (including because of James P. Spears’s failure to cooperate in
16 discovery in this matter) to the extent it seeks information outside of Responding Party’s possession,
17 custody, and control, and/or particularly within James P. Spears’s possession, custody, and control.

18 Responding Party objects to this interrogatory on the grounds that it seeks documents or
19 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
20 evidence.

21 Responding Party objects to the extent the interrogatory seeks confidential or private information
22 about persons who are not parties to this case, and without notice to said parties.

23 **AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 1:**

24 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
25 in full. Further:

26 Responding Party objects that the interrogatory is vague and ambiguous as to the undefined
27 phrase “claims and defenses in this action,” particularly given that there are no complaints or counter-
28 claims pending at this time.

1 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
2 burdensome, and calling for speculation regarding what information third parties are “likely to have”
3 “along with the subjects of that information.”

4 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion,
5 including as to what constitutes “discoverable information.”

6 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
7 attorney-privileged communications or attorney work-product.

8 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
9 burdensome, oppressive, and premature (including because of James P. Spears’s failure to cooperate in
10 discovery in this matter) to the extent it seeks information outside of Responding Party’s possession,
11 custody, and control, and/or particularly within James P. Spears’s possession, custody, and control.

12 Responding Party objects to this interrogatory on the grounds that it seeks documents or
13 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
14 evidence.

15 Responding Party objects to the extent the interrogatory seeks confidential or private information
16 about persons who are not parties to this case, and without notice to said parties.

17 Subject to the Preliminary Statement and General Objections, each of which is incorporated
18 herein as though set forth in full, and the foregoing, Responding Party identifies those persons listed in
19 her First Amended Responses to James P. Spears’s Form Interrogatories (Set One), Response to Form
20 Interrogatory No. 17.1.

21 **SPECIAL INTERROGATORY NO. 2:**

22 State all facts supporting any contention by you that: James P. Spears “concealed his conduct,
23 and the past accountings were, at best, incomplete.” *See, e.g.,* Britney Jean Spears’s Objections And
24 Opposition To James P. Spears’s Petition For Order Confirming, Authorizing, And Instructing Payment
25 On Account Of James P. Spears’s Attorneys’ Fees From The Estate Or Britney Jean Spears filed
26 January 14, 2022 in Los Angeles Superior Court case number BP108870 (“BRITNEY’S JANUARY
27 2022 FEE PETITION OBJECTIONS”) at ¶ 19.
28

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 2:**

2 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
3 in full. Further:

4 Responding Party objects to this interrogatory as overbroad, unduly burdensome, oppressive, and
5 disproportional to the needs of the case to the extent it purports to require the Responding Party to
6 provide a narrative response “[s]tat[ing] all facts supporting” a contention. In responding to the
7 interrogatory, Responding Party will interpret it as seeking only the material facts supporting the
8 contention.

9 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

10 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
11 attorney-privileged communications or attorney work-product.

12 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
13 burdensome, oppressive, and premature (including because of James P. Spears’s failure to cooperate in
14 discovery in this matter) to the extent it seeks information outside of Responding Party’s possession,
15 custody, and control, and/or particularly within James P. Spears’s possession, custody, and control.

16 Responding Party objects to this interrogatory on the grounds that it seeks documents or
17 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
18 evidence.

19 **AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 2:**

20 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
21 in full. Further:

22 Responding Party objects to this interrogatory as overbroad, unduly burdensome, oppressive, and
23 disproportional to the needs of the case to the extent it purports to require the Responding Party to
24 provide a narrative response “[s]tat[ing] all facts supporting” a contention. In responding to the
25 interrogatory, Responding Party will interpret it as seeking only the material facts supporting the
26 contention.

27 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.
28

1 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
2 attorney-privileged communications or attorney work-product.

3 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
4 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
5 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
6 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

7 Responding Party objects to this interrogatory on the grounds that it seeks documents or
8 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
9 evidence.

10 Subject to the Preliminary Statement and General Objections, each of which is incorporated
11 herein as though set forth in full, and the foregoing, Responding Party incorporates the responses
12 provided in her First Amended Responses to James P. Spears's Form Interrogatories (Set One),
13 Response to Form Interrogatory No. 17.1.

14 **SPECIAL INTERROGATORY NO. 3:**

15 Identify all persons (by name, phone number, and address) with knowledge of the facts relating
16 to any contention by you that: James P. Spears "concealed his conduct, and the past accountings were,
17 at best, incomplete." *See, e.g.,* BRITNEY'S JANUARY 2022 FEE PETITION OBJECTIONS at ¶ 19.

18 **RESPONSE TO SPECIAL INTERROGATORY NO. 3:**

19 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
20 in full. Further:

21 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

22 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
23 attorney-privileged communications or attorney work-product.

24 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
25 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
26 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
27 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.
28

1 Responding Party objects to this interrogatory on the grounds that it seeks documents or
2 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
3 evidence.

4 Responding Party objects to the extent the interrogatory seeks confidential or private information
5 about persons who are not parties to this case, and without notice to said parties.

6 **AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 3:**

7 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
8 in full. Further:

9 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

10 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
11 attorney-privileged communications or attorney work-product.

12 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
13 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
14 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
15 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

16 Responding Party objects to this interrogatory on the grounds that it seeks documents or
17 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
18 evidence.

19 Responding Party objects to the extent the interrogatory seeks confidential or private information
20 about persons who are not parties to this case, and without notice to said parties.

21 Subject to the Preliminary Statement and General Objections, each of which is incorporated
22 herein as though set forth in full, and the foregoing, Responding Party identifies those persons listed in
23 her First Amended Responses to James P. Spears's Form Interrogatories (Set One), Response to Form
24 Interrogatory No. 17.1.

25 **SPECIAL INTERROGATORY NO. 4:**

26 Identify all DOCUMENTS supporting your response to Special Interrogatory No. 2. (For the
27 purposes of these interrogatories, "DOCUMENT(S)" shall have the broadest meaning ascribed to it by
28 California Civil Procedure Code Section 2016.020 and California Evidence Code Section 250,

1 including, without limitation, electronic or computerized data compilations, email, and text messages. A
2 draft or non-identical copy of a document is a separate document within the meaning of this term.).

3 **RESPONSE TO SPECIAL INTERROGATORY NO. 4:**

4 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
5 in full. Further:

6 Responding Party incorporates its objections to Special Interrogatory No. 2 as if set forth in full.

7 Responding Party objects that the interrogatory is vague and ambiguous as to the undefined term
8 “Identify.”

9 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

10 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
11 attorney-privileged communications or attorney work-product.

12 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
13 burdensome, oppressive, and premature (including because of James P. Spears’s failure to cooperate in
14 discovery in this matter) to the extent it seeks information outside of Responding Party’s possession,
15 custody, and control, and/or particularly within James P. Spears’s possession, custody, and control.

16 Responding Party objects to this interrogatory on the grounds that it seeks documents or
17 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
18 evidence.

19 **AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 4:**

20 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
21 in full. Further:

22 Responding Party incorporates its objections to Special Interrogatory No. 2 as if set forth in full.

23 Responding Party objects that the interrogatory is vague and ambiguous as to the undefined term
24 “Identify.”

25 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

26 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
27 attorney-privileged communications or attorney work-product.
28

1 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
2 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
3 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
4 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

5 Responding Party objects to this interrogatory on the grounds that it seeks documents or
6 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
7 evidence.

8 Subject to the Preliminary Statement and General Objections, each of which is incorporated
9 herein as though set forth in full, and the foregoing, Responding Party identifies those documents
10 identified in her First Amended Responses to James P. Spears's Form Interrogatories (Set One),
11 Response to Form Interrogatory No. 17.1.

12 **SPECIAL INTERROGATORY NO. 5:**

13 State all facts supporting any contention by you that: James P. Spears "expressed particular
14 interest in monitoring his daughter's communications with her personal attorney Sam Ingham, and he
15 wanted regular updates from Black Box on the substance of those attorney-client privileged messages."
16 *See, e.g.,* BRITNEY'S JANUARY 2022 FEE PETITION OBJECTIONS at ¶ 63.

17 **RESPONSE TO SPECIAL INTERROGATORY NO. 5:**

18 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
19 in full. Further:

20 Responding Party objects to this interrogatory as overbroad, unduly burdensome, oppressive, and
21 disproportional to the needs of the case to the extent it purports to require the Responding Party to
22 provide a narrative response "[s]tat[ing] all facts supporting" a contention. In responding to the
23 interrogatory, Responding Party will interpret it as seeking only the material facts supporting the
24 contention.

25 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

26 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
27 attorney-privileged communications or attorney work-product.
28

1 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
2 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
3 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
4 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

5 Responding Party objects to this interrogatory on the grounds that it seeks documents or
6 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
7 evidence.

8 **AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 5:**

9 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
10 in full. Further:

11 Responding Party objects to this interrogatory as overbroad, unduly burdensome, oppressive, and
12 disproportional to the needs of the case to the extent it purports to require the Responding Party to
13 provide a narrative response "[s]tat[ing] all facts supporting" a contention. In responding to the
14 interrogatory, Responding Party will interpret it as seeking only the material facts supporting the
15 contention.

16 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

17 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
18 attorney-privileged communications or attorney work-product.

19 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
20 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
21 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
22 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

23 Responding Party objects to this interrogatory on the grounds that it seeks documents or
24 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
25 evidence.

26 Subject to the Preliminary Statement and General Objections, each of which is incorporated
27 herein as though set forth in full, and the foregoing, Responding Party responds as follows:
28

1 In directing the surveillance efforts directed toward his daughter, Mr. Spears had Black Box
2 Security provide him access to private communications of his daughter, which his own counsel advised
3 he had no right to see. (Ebadi Decl. ¶ 31.) Mr. Spears expressed particular interest in monitoring his
4 daughter's communications with her personal attorney Sam Ingham, and he wanted regular updates
5 from Black Box on the substance of those attorney-client privileged messages. (Ebadi Decl. ¶ 32.) In
6 addition, Responding Party incorporates the responses provided in her First Amended Responses to
7 James P. Spears's Form Interrogatories (Set One), Response to Form Interrogatory No. 17.1.

8 **SPECIAL INTERROGATORY NO. 6:**

9 Identify all persons (by name, phone number, and address) with knowledge of the facts relating
10 to any contention by you that: James P. Spears "expressed particular interest in monitoring his
11 daughter's communications with her personal attorney Sam Ingham, and he wanted regular updates
12 from Black Box on the substance of those attorney-client privileged messages." *See, e.g.,* BRITNEY'S
13 JANUARY 2022 FEE PETITION OBJECTIONS at ¶ 63.

14 **RESPONSE TO SPECIAL INTERROGATORY NO. 6:**

15 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
16 in full. Further:

17 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

18 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
19 attorney-privileged communications or attorney work-product.

20 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
21 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
22 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
23 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

24 Responding Party objects to this interrogatory on the grounds that it seeks documents or
25 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
26 evidence.

27 Responding Party objects to the extent the interrogatory seeks confidential or private information
28 about persons who are not parties to this case, and without notice to said parties.

1 **AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 6:**

2 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
3 in full. Further:

4 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

5 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
6 attorney-privileged communications or attorney work-product.

7 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
8 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
9 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
10 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

11 Responding Party objects to this interrogatory on the grounds that it seeks documents or
12 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
13 evidence.

14 Responding Party objects to the extent the interrogatory seeks confidential or private information
15 about persons who are not parties to this case, and without notice to said parties.

16 Subject to the Preliminary Statement and General Objections, each of which is incorporated
17 herein as though set forth in full, and the foregoing, Responding Party identifies Mr. Spears, his counsel,
18 Robin Greenhill of Tri Star Sports & Entertainment, LLC, Alex Vlasov, and Sherine Ebadi.

19 **SPECIAL INTERROGATORY NO. 7:**

20 Identify all DOCUMENTS supporting your response to Special Interrogatory No. 5.

21 **RESPONSE TO SPECIAL INTERROGATORY NO. 7:**

22 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
23 in full. Further:

24 Responding Party incorporates its objections to Special Interrogatory No. 5 as if set forth in full.

25 Responding Party objects that the interrogatory is vague and ambiguous as to the undefined term
26 "Identify."

27 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.
28

1 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
2 attorney-privileged communications or attorney work-product.

3 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
4 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
5 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
6 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

7 Responding Party objects to this interrogatory on the grounds that it seeks documents or
8 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
9 evidence.

10 **AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 7:**

11 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
12 in full. Further:

13 Responding Party incorporates its objections to Special Interrogatory No. 5 as if set forth in full.

14 Responding Party objects that the interrogatory is vague and ambiguous as to the undefined term
15 "Identify."

16 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

17 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
18 attorney-privileged communications or attorney work-product.

19 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
20 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
21 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
22 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

23 Responding Party objects to this interrogatory on the grounds that it seeks documents or
24 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
25 evidence.

26 Subject to the Preliminary Statement and General Objections, each of which is incorporated
27 herein as though set forth in full, and the foregoing, Responding Party identifies the Declaration of
28 Sherine Ebadi and documents that will be produced and/or made available for inspection by Kroll;

reference is made to the forthcoming production to be made by Kroll pursuant to subpoena and Kroll's responses/supplemental responses and objections thereto.

SPECIAL INTERROGATORY NO. 8:

State all facts supporting any contention by you that: James P. Spears "used Black Box's surveillance apparatus to access Britney Spears's therapy notes, despite being told by his counsel that he could not have access to those notes without Britney's permission." *See, e.g.,* BRITNEY'S JANUARY 2022 FEE PETITION OBJECTIONS at ¶ 65.

RESPONSE TO SPECIAL INTERROGATORY NO. 8:

Responding Party incorporates the Preliminary Statement and General Objections as if set forth in full. Further:

Responding Party objects to this interrogatory as overbroad, unduly burdensome, oppressive, and disproportional to the needs of the case to the extent it purports to require the Responding Party to provide a narrative response "[s]tat[ing] all facts supporting" a contention. In responding to the interrogatory, Responding Party will interpret it as seeking only the material facts supporting the contention.

Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

Responding Party objects to this interrogatory to the extent it seeks to uncover the content of attorney-privileged communications or attorney work-product.

Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in discovery in this matter) to the extent it seeks information outside of Responding Party's possession, custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

Responding Party objects to this interrogatory on the grounds that it seeks documents or information that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 8:

Responding Party incorporates the Preliminary Statement and General Objections as if set forth in full. Further:

1 Responding Party objects to this interrogatory as overbroad, unduly burdensome, oppressive, and
2 disproportional to the needs of the case to the extent it purports to require the Responding Party to
3 provide a narrative response “[s]tat[ing] all facts supporting” a contention. In responding to the
4 interrogatory, Responding Party will interpret it as seeking only the material facts supporting the
5 contention.

6 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

7 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
8 attorney-privileged communications or attorney work-product.

9 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
10 burdensome, oppressive, and premature (including because of James P. Spears’s failure to cooperate in
11 discovery in this matter) to the extent it seeks information outside of Responding Party’s possession,
12 custody, and control, and/or particularly within James P. Spears’s possession, custody, and control.

13 Responding Party objects to this interrogatory on the grounds that it seeks documents or
14 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
15 evidence.

16 Subject to the Preliminary Statement and General Objections, each of which is incorporated
17 herein as though set forth in full, and the foregoing, Responding Party refers James Spears to the
18 Declaration of Sherine Ebadi and documents that will be produced and/or made available for inspection
19 by Kroll; reference is made to the forthcoming production to be made by Kroll pursuant to subpoena and
20 Kroll’s responses/supplemental responses and objections thereto.

21 **SPECIAL INTERROGATORY NO. 9:**

22 Identify all persons (by name, phone number, and address) with knowledge of the facts relating
23 to any contention by you that: James P. Spears “used Black Box’s surveillance apparatus to access
24 Britney Spears’s therapy notes, despite being told by his counsel that he could not have access to those
25 notes without Britney’s permission.” *See, e.g.,* BRITNEY’S JANUARY 2022 FEE PETITION
26 OBJECTIONS at ¶ 65.

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 9:**

2 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
3 in full. Further:

4 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

5 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
6 attorney-privileged communications or attorney work-product.

7 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
8 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
9 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
10 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

11 Responding Party objects to this interrogatory on the grounds that it seeks documents or
12 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
13 evidence.

14 Responding Party objects to the extent the interrogatory seeks confidential or private information
15 about persons who are not parties to this case, and without notice to said parties.

16 **AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 9:**

17 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
18 in full. Further:

19 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

20 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
21 attorney-privileged communications or attorney work-product.

22 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
23 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
24 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
25 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

26 Responding Party objects to this interrogatory on the grounds that it seeks documents or
27 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
28 evidence.

1 Responding Party objects to the extent the interrogatory seeks confidential or private information
2 about persons who are not parties to this case, and without notice to said parties.

3 Subject to the Preliminary Statement and General Objections, each of which is incorporated
4 herein as though set forth in full, and the foregoing, Responding Party identifies Mr. Spears, his counsel,
5 Robin Greenhill, Alex Vlasov, and Sherine Ebadi.

6 **SPECIAL INTERROGATORY NO. 10:**

7 Identify all DOCUMENTS supporting your response to Special Interrogatory No. 8.

8 **RESPONSE TO SPECIAL INTERROGATORY NO. 10:**

9 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
10 in full. Further:

11 Responding Party incorporates its objections to Special Interrogatory No. 8 as if set forth in full.

12 Responding Party objects that the interrogatory is vague and ambiguous as to the undefined term
13 “Identify.”

14 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

15 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
16 attorney-privileged communications or attorney work-product.

17 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
18 burdensome, oppressive, and premature (including because of James P. Spears’s failure to cooperate in
19 discovery in this matter) to the extent it seeks information outside of Responding Party’s possession,
20 custody, and control, and/or particularly within James P. Spears’s possession, custody, and control.

21 Responding Party objects to this interrogatory on the grounds that it seeks documents or
22 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
23 evidence.

24 **AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 10:**

25 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
26 in full. Further:

27 Responding Party incorporates its objections to Special Interrogatory No. 8 as if set forth in full.
28

1 Responding Party objects that the interrogatory is vague and ambiguous as to the undefined term
2 “Identify.”

3 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

4 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
5 attorney-privileged communications or attorney work-product.

6 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
7 burdensome, oppressive, and premature (including because of James P. Spears’s failure to cooperate in
8 discovery in this matter) to the extent it seeks information outside of Responding Party’s possession,
9 custody, and control, and/or particularly within James P. Spears’s possession, custody, and control.

10 Responding Party objects to this interrogatory on the grounds that it seeks documents or
11 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
12 evidence.

13 Subject to the Preliminary Statement and General Objections, each of which is incorporated
14 herein as though set forth in full, and the foregoing, Responding Party refers James Spears to the
15 Declaration of Sherine Ebadi and documents that will be produced and/or made available for inspection
16 by Kroll; reference is made to the forthcoming production to be made by Kroll pursuant to subpoena and
17 Kroll’s responses/supplemental responses and objections thereto.

18 **SPECIAL INTERROGATORY NO. 11:**

19 State all facts supporting any contention by you that: James P. Spears “instructed Black Box to
20 place a secret recording device in Ms. Spears’s bedroom.” *See, e.g.,* BRITNEY’S JANUARY 2022
21 FEE PETITION OBJECTIONS at ¶ 67.

22 **RESPONSE TO SPECIAL INTERROGATORY NO. 11:**

23 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
24 in full. Further:

25 Responding Party objects to this interrogatory as overbroad, unduly burdensome, oppressive, and
26 disproportional to the needs of the case to the extent it purports to require the Responding Party to
27 provide a narrative response “[s]tat[ing] all facts supporting” a contention. In responding to the
28

1 interrogatory, Responding Party will interpret it as seeking only the material facts supporting the
2 contention.

3 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

4 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
5 attorney-privileged communications or attorney work-product.

6 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
7 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
8 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
9 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

10 Responding Party objects to this interrogatory on the grounds that it seeks documents or
11 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
12 evidence.

13 **AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 11:**

14 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
15 in full. Further:

16 Responding Party objects to this interrogatory as overbroad, unduly burdensome, oppressive, and
17 disproportional to the needs of the case to the extent it purports to require the Responding Party to
18 provide a narrative response "[s]tat[ing] all facts supporting" a contention. In responding to the
19 interrogatory, Responding Party will interpret it as seeking only the material facts supporting the
20 contention.

21 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

22 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
23 attorney-privileged communications or attorney work-product.

24 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
25 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
26 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
27 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.
28

1 Responding Party objects to this interrogatory on the grounds that it seeks documents or
2 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
3 evidence.

4 Subject to the Preliminary Statement and General Objections, each of which is incorporated
5 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

6 In its September 24, 2021 documentary “Controlling Britney Spears” and its accompanying front
7 page report, *The New York Times* revealed that Mr. Spears used Black Box Security to violate Britney
8 Spears’s privacy and monitor her attorney-client privileged communications, among others. Previously,
9 Mr. Spears belittled the documentary as a “tv show” and its front-page story as rhetoric without support,
10 but as contained in the evidence itself and the accompanying Declaration of ex-FBI Special Agent
11 Sherine Ebadi, there is substantial support and corroboration in the form of Black Box whistleblower
12 Alex Vlasov (a witness deemed by Ms. Ebadi to be highly credible (Ebadi Decl. ¶ 24)), and, as the
13 Times reported, evidence of Black Box’s underlying electronic surveillance of Britney Spears.
14 Mr. Vlasov has also confirmed that Black Box treated Mr. Spears (not his daughter) as its client and that
15 Mr. Spears was the person making the decisions and giving direction. (Ebadi Decl., ¶¶ 23-25; *see also*
16 Ebadi Decl. ¶¶ 27-28 and generally.)

17 According to Mr. Vlasov, in or about 2015, and evidently with the knowledge of Tri Star’s
18 Robin Greenhill, Mr. Spears instructed Black Box to mirror Britney’s iCloud account—where Britney’s
19 text messages and content were stored in real time—to a separate iPad that Black Box could see,
20 intercept, and/or review contemporaneously. At the time, Mr. Vlasov told Mr. Yemini that they should
21 not monitor the phone in this way because it made the contents of Ms. Spears’s iCloud vulnerable to
22 hackers. Mr. Yemini reportedly relayed Mr. Vlasov’s concerns to Mr. Spears and Robin Greenhill, but
23 they said they were willing to take that risk. Black Box did as Mr. Spears instructed, purchasing an iPad
24 and linking it to Britney Spears’s iCloud account. The iPad was kept in a safe in Black Box’s offices.
25 (Ebadi Decl. ¶¶ 29-30.)

26 Black Box would regularly review the iPad’s contents (which again, captured Ms. Spears’s
27 communications in real time, contemporaneously) and put the data in encrypted folders before sending
28 them to Mr. Spears, at his request. Sometimes, Mr. Spears would ask Black Box to send him specific

1 items of interest from Ms. Spears’s iCloud, such as text messages and communications with her counsel.
2 (Ebadi Decl. ¶¶ 30-31.)

3 In directing these surveillance efforts, Mr. Spears had Black Box provide him access to private
4 communications of his daughter, which his own counsel advised he had no right to see. (Ebadi Decl.
5 ¶ 31.) Mr. Spears expressed particular interest in monitoring his daughter’s communications with her
6 personal attorney Sam Ingham, and he wanted regular updates from Black Box on the substance of those
7 attorney-client privileged messages. (Ebadi Decl. ¶ 32.)

8 In what is arguably an even more shocking and unconscionable invasion of Ms. Spears’s
9 privacy, Mr. Spears instructed Black Box to place a secret recording device in Ms. Spears’s bedroom, in
10 apparent violation of the California Invasion of Privacy Act (“CIPA”), California Penal Code § 630 *et*
11 *seq.* Notably, CIPA requires that all parties consent to a recording of their private conversation, and it
12 provides for criminal penalties for individuals who record communications without the necessary two-
13 party consent. It also permits victims to recover treble damages or \$5,000 per violation through a civil
14 action. (*Id.* at §637.2(a).) Accordingly, even if one indulged the fiction that Mr. Spears could “consent”
15 to such recording on behalf of his daughter—a prospect that would shock the conscience and invade
16 Ms. Spears’s constitutional rights—no justification would exist for recording the other participants to
17 Ms. Spears’s private conversations.

18 Mr. Vlasov learned of the bedroom surveillance in or around 2018, when Mr. Yemini and a
19 fellow Black Box employee asked him to wipe (eliminate) the contents of a USB drive connected to a
20 digital recording device. The digital recording device had an SD (Digital Memory) card, a battery pack
21 attached to it, and was covered in duct tape. According to Mr. Vlasov, Mr. Spears “loved” the idea of
22 eavesdropping on his daughter and approved and directed the installation. Later, a Black Box employee
23 told Mr. Vlasov that he and Mr. Yemini had listened to the recordings and found nothing “useful.”
24 (Ebadi Decl. ¶ 38; *see* Ebadi Declaration, *passim*.)

25 When Mr. Vlasov plugged the device into his computer, he saw that there were files from 2016-
26 2018 on the device with hundreds of hours of audio recording, including private conversations between
27 Ms. Spears and others, including her children. (Ebadi Decl. ¶ 39.)
28

1 **SPECIAL INTERROGATORY NO. 12:**

2 Identify all persons (by name, phone number, and address) with knowledge of the facts relating
3 to any contention by you that: James P. Spears “instructed Black Box to place a secret recording device
4 in Ms. Spears’s bedroom.” *See, e.g.,* BRITNEY’S JANUARY 2022 FEE PETITION OBJECTIONS at
5 ¶ 67.

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 12:**

7 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
8 in full. Further:

9 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

10 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
11 attorney-privileged communications or attorney work-product.

12 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
13 burdensome, oppressive, and premature (including because of James P. Spears’s failure to cooperate in
14 discovery in this matter) to the extent it seeks information outside of Responding Party’s possession,
15 custody, and control, and/or particularly within James P. Spears’s possession, custody, and control.

16 Responding Party objects to this interrogatory on the grounds that it seeks documents or
17 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
18 evidence.

19 Responding Party objects to the extent the interrogatory seeks confidential or private information
20 about persons who are not parties to this case, and without notice to said parties.

21 **AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 12:**

22 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
23 in full. Further:

24 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

25 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
26 attorney-privileged communications or attorney work-product.

27 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
28 burdensome, oppressive, and premature (including because of James P. Spears’s failure to cooperate in

1 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
2 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

3 Responding Party objects to this interrogatory on the grounds that it seeks documents or
4 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
5 evidence.

6 Responding Party objects to the extent the interrogatory seeks confidential or private information
7 about persons who are not parties to this case, and without notice to said parties.

8 Subject to the Preliminary Statement and General Objections, each of which is incorporated
9 herein as though set forth in full, and the foregoing, Responding Party identifies Mr. Spears, his counsel,
10 Edan Yemini, Alex Vlasov, and Sherine Ebadi.

11 **SPECIAL INTERROGATORY NO. 13:**

12 Identify all DOCUMENTS supporting your response to Special Interrogatory No. 11.

13 **RESPONSE TO SPECIAL INTERROGATORY NO. 13:**

14 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
15 in full. Further:

16 Responding Party incorporates its objections to Special Interrogatory No. 11 as if set forth in
17 full.

18 Responding Party objects that the interrogatory is vague and ambiguous as to the undefined term
19 "Identify."

20 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

21 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
22 attorney-privileged communications or attorney work-product.

23 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
24 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
25 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
26 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.
27
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1 Responding Party objects to this interrogatory on the grounds that it seeks documents or
2 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
3 evidence.

4 **AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 13:**

5 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
6 in full. Further:

7 Responding Party incorporates its objections to Special Interrogatory No. 11 as if set forth in
8 full.

9 Responding Party objects that the interrogatory is vague and ambiguous as to the undefined term
10 “Identify.”

11 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

12 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
13 attorney-privileged communications or attorney work-product.

14 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
15 burdensome, oppressive, and premature (including because of James P. Spears’s failure to cooperate in
16 discovery in this matter) to the extent it seeks information outside of Responding Party’s possession,
17 custody, and control, and/or particularly within James P. Spears’s possession, custody, and control.

18 Responding Party objects to this interrogatory on the grounds that it seeks documents or
19 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
20 evidence.

21 Subject to the Preliminary Statement and General Objections, each of which is incorporated
22 herein as though set forth in full, and the foregoing, Responding Party refers James Spears to the
23 Declaration of Sherine Ebadi and documents that will be produced and/or made available for inspection
24 by Kroll; reference is made to the forthcoming production to be made by Kroll pursuant to subpoena and
25 Kroll’s responses/supplemental responses and objections thereto.
26
27
28

1 **SPECIAL INTERROGATORY NO. 14:**

2 State all facts supporting any contention by you that: James P. Spears “moved to isolate [you]
3 and install representatives loyal to him, all of whom received exorbitant compensation.” *See, e.g.,*
4 BRITNEY’S JANUARY 2022 FEE PETITION OBJECTIONS at ¶¶ 74-75.

5 **RESPONSE TO SPECIAL INTERROGATORY NO. 14:**

6 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
7 in full. Further:

8 Responding Party objects to this interrogatory as overbroad, unduly burdensome, oppressive, and
9 disproportional to the needs of the case to the extent it purports to require the Responding Party to
10 provide a narrative response “[s]tat[ing] all facts supporting” a contention. In responding to the
11 interrogatory, Responding Party will interpret it as seeking only the material facts supporting the
12 contention.

13 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

14 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
15 attorney-privileged communications or attorney work-product.

16 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
17 burdensome, oppressive, and premature (including because of James P. Spears’s failure to cooperate in
18 discovery in this matter) to the extent it seeks information outside of Responding Party’s possession,
19 custody, and control, and/or particularly within James P. Spears’s possession, custody, and control.

20 Responding Party objects to this interrogatory on the grounds that it seeks documents or
21 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
22 evidence.

23 **AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 14:**

24 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
25 in full. Further:

26 Responding Party objects to this interrogatory as overbroad, unduly burdensome, oppressive, and
27 disproportional to the needs of the case to the extent it purports to require the Responding Party to
28 provide a narrative response “[s]tat[ing] all facts supporting” a contention. In responding to the

1 interrogatory, Responding Party will interpret it as seeking only the material facts supporting the
2 contention.

3 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

4 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
5 attorney-privileged communications or attorney work-product.

6 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
7 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
8 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
9 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

10 Responding Party objects to this interrogatory on the grounds that it seeks documents or
11 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
12 evidence.

13 Subject to the Preliminary Statement and General Objections, each of which is incorporated
14 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

15 At the time he established the conservatorship, and while still owing an unknown portion of the
16 \$40,000 Tri Star had loaned him, Mr. Spears installed his friend Lou Taylor of Tri Star as Britney's
17 business manager. Tri Star was paid exorbitant amounts of money by Mr. Spears. Mr. Spears also
18 replaced Britney Spears's prior security detail with his friend, Edan Yemini and Black Box Security,
19 who, according to data obtained from Tri Star, were ultimately paid approximately \$6 million from
20 Ms. Spears's Estate. At the time, both Tri Star and Black Box were fledgling businesses, and none of
21 their clients was remotely the caliber of Britney Spears. (Ebadi Decl. ¶¶ 14-15.)

22 Mr. Spears also sought to silence and remove those who spoke out against him or the
23 conservatorship, including Ms. Spears's friends and Ms. Spears herself. For example, Britney Spears's
24 former wardrobe coordinator, Tish Yates, revealed that Ms. Spears was "tortured" and recounted
25 incidents when she try to stand up for herself, but when she did, Mr. Spears would threaten to prevent
26 Britney from seeing her children. (Ebadi Decl. ¶ 20.) Ms. Spears's tour manager Dan George similarly
27 observed that, "the first rule of the conservatorship was that you don't talk about the conservatorship."
28 He said he was warned to "Be careful. Don't get too close. People have a way of disappearing." (Ebadi

Decl. ¶ 21.) Similarly, Marc Delcore, Britney Spears’s long-time music supervisor informed Ms. Ebadi that he was warned by Mr. Spears about what he could or could not discuss with Ms. Spears. (Ebadi Decl. ¶ 19.) And whistleblower Alex Vlasov, the former Black Box Security employee, revealed that individuals on Ms. Spears’s security detail who were sympathetic to her, or who questioned some of the extreme measures taken to control her, were removed. (Ebadi Decl. ¶ 22.)

SPECIAL INTERROGATORY NO. 15:

Identify all persons (by name, phone number, and address) with knowledge of the facts relating to any contention by you that: James P. Spears “moved to isolate [you] and install representatives loyal to him, all of whom received exorbitant compensation.” *See, e.g.*, BRITNEY’S JANUARY 2022 FEE PETITION OBJECTIONS at ¶¶ 74-75.

RESPONSE TO SPECIAL INTERROGATORY NO. 15:

Responding Party incorporates the Preliminary Statement and General Objections as if set forth in full. Further:

Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

Responding Party objects to this interrogatory to the extent it seeks to uncover the content of attorney-privileged communications or attorney work-product.

Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly burdensome, oppressive, and premature (including because of James P. Spears’s failure to cooperate in discovery in this matter) to the extent it seeks information outside of Responding Party’s possession, custody, and control, and/or particularly within James P. Spears’s possession, custody, and control.

Responding Party objects to this interrogatory on the grounds that it seeks documents or information that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects to the extent the interrogatory seeks confidential or private information about persons who are not parties to this case, and without notice to said parties.

AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 15:

Responding Party incorporates the Preliminary Statement and General Objections as if set forth in full. Further:

1 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

2 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
3 attorney-privileged communications or attorney work-product.

4 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
5 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
6 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
7 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

8 Responding Party objects to this interrogatory on the grounds that it seeks documents or
9 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
10 evidence.

11 Responding Party objects to the extent the interrogatory seeks confidential or private information
12 about persons who are not parties to this case, and without notice to said parties.

13 Subject to the Preliminary Statement and General Objections, each of which is incorporated
14 herein as though set forth in full, and the foregoing, Responding Party identifies Mr. Spears, his counsel,
15 Alex Vlasov, Sherine Ebadi, Edan Yemini, Tish Yates, and Dan George.

16 **SPECIAL INTERROGATORY NO. 16:**

17 Identify all DOCUMENTS supporting your response to Special Interrogatory No. 14.

18 **RESPONSE TO SPECIAL INTERROGATORY NO. 16:**

19 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
20 in full. Further:

21 Responding Party incorporates its objections to Special Interrogatory No. 14 as if set forth in
22 full.

23 Responding Party objects that the interrogatory is vague and ambiguous as to the undefined term
24 "Identify."

25 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

26 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
27 attorney-privileged communications or attorney work-product.

1 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
2 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
3 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
4 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

5 Responding Party objects to this interrogatory on the grounds that it seeks documents or
6 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
7 evidence.

8 **AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 16:**

9 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
10 in full. Further:

11 Responding Party incorporates its objections to Special Interrogatory No. 14 as if set forth in
12 full.

13 Responding Party objects that the interrogatory is vague and ambiguous as to the undefined term
14 "Identify."

15 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

16 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
17 attorney-privileged communications or attorney work-product.

18 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
19 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
20 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
21 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

22 Responding Party objects to this interrogatory on the grounds that it seeks documents or
23 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
24 evidence.

25 Subject to the Preliminary Statement and General Objections, each of which is incorporated
26 herein as though set forth in full, and the foregoing, Responding Party refers James Spears to the
27 Declaration of Sherine Ebadi and documents that will be produced and/or made available for inspection
28

1 by Kroll; reference is made to the forthcoming production to be made by Kroll pursuant to subpoena and
2 Kroll's responses/supplemental responses and objections thereto.

3 **SPECIAL INTERROGATORY NO. 17:**

4 State all facts supporting any contention by you that: James P. Spears "has already paid himself
5 more than \$6 million for occupying the role of Conservator, all while mismanaging the Estate." *See*,
6 *e.g.*, BRITNEY'S JANUARY 2022 FEE PETITION OBJECTIONS at ¶ 93.

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 17:**

8 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
9 in full. Further:

10 Responding Party objects to this interrogatory as overbroad, unduly burdensome, oppressive, and
11 disproportional to the needs of the case to the extent it purports to require the Responding Party to
12 provide a narrative response "[s]tat[ing] all facts supporting" a contention. In responding to the
13 interrogatory, Responding Party will interpret it as seeking only the material facts supporting the
14 contention.

15 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

16 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
17 attorney-privileged communications or attorney work-product.

18 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
19 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
20 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
21 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

22 Responding Party objects to this interrogatory on the grounds that it seeks documents or
23 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
24 evidence.

25 **AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 17:**

26 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
27 in full. Further:
28

1 Responding Party objects to this interrogatory as overbroad, unduly burdensome, oppressive, and
2 disproportional to the needs of the case to the extent it purports to require the Responding Party to
3 provide a narrative response “[s]tat[ing] all facts supporting” a contention. In responding to the
4 interrogatory, Responding Party will interpret it as seeking only the material facts supporting the
5 contention.

6 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

7 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
8 attorney-privileged communications or attorney work-product.

9 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
10 burdensome, oppressive, and premature (including because of James P. Spears’s failure to cooperate in
11 discovery in this matter) to the extent it seeks information outside of Responding Party’s possession,
12 custody, and control, and/or particularly within James P. Spears’s possession, custody, and control.

13 Responding Party objects to this interrogatory on the grounds that it seeks documents or
14 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
15 evidence.

16 Subject to the Preliminary Statement and General Objections, each of which is incorporated
17 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

18 It is a matter of record, and Mr. Spears himself obviously knows, that he and his phalanx of
19 lawyers have been lavishly compensated for well over a decade, reaping many millions of dollars in
20 connection with a conservatorship or in service of a conservator who has been suspended. Based upon
21 public records and QuickBooks data obtained by Kroll, and as documents and information within Mr.
22 Spears’s own possession show, Mr. Spears took more than \$6 million from the Estate personally, in
23 addition to his “salary” and payments to him for “office space.” As regarding Mr. Spears’s
24 mismanagement, Responding Party incorporates herein by this reference her responses to Form
25 Interrogatory (Set One), No. 17.1, her responses to Special Interrogatories Nos. 1-17, the facts and
26 information contained in the Declaration of Sherine Ebadi, and documents that will be produced and/or
27 made available for inspection by Kroll; reference is made to the forthcoming production to be made by
28 Kroll pursuant to subpoena and Kroll’s responses/supplemental responses and objections thereto.

1 **SPECIAL INTERROGATORY NO. 18:**

2 Identify all persons (by name, phone number, and address) with knowledge of the facts relating
3 to any contention by you that: James P. Spears “has already paid himself more than \$6 million for
4 occupying the role of Conservator, all while mismanaging the Estate.” *See, e.g.,* BRITNEY’S
5 JANUARY 2022 FEE PETITION OBJECTIONS at ¶ 93.

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 18:**

7 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
8 in full. Further:

9 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

10 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
11 attorney-privileged communications or attorney work-product.

12 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
13 burdensome, oppressive, and premature (including because of James P. Spears’s failure to cooperate in
14 discovery in this matter) to the extent it seeks information outside of Responding Party’s possession,
15 custody, and control, and/or particularly within James P. Spears’s possession, custody, and control.

16 Responding Party objects to this interrogatory on the grounds that it seeks documents or
17 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
18 evidence.

19 Responding Party objects to the extent the interrogatory seeks confidential or private information
20 about persons who are not parties to this case, and without notice to said parties.

21 **AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 18:**

22 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
23 in full. Further:

24 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

25 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
26 attorney-privileged communications or attorney work-product.

27 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
28 burdensome, oppressive, and premature (including because of James P. Spears’s failure to cooperate in

1 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
2 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

3 Responding Party objects to this interrogatory on the grounds that it seeks documents or
4 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
5 evidence.

6 Responding Party objects to the extent the interrogatory seeks confidential or private information
7 about persons who are not parties to this case, and without notice to said parties.

8 Subject to the Preliminary Statement and General Objections, each of which is incorporated
9 herein as though set forth in full, and the foregoing, Responding Party identifies Mr. Spears, Tri Star, his
10 counsel, and Sherine Ebadi.

11 **SPECIAL INTERROGATORY NO. 19:**

12 Identify all DOCUMENTS supporting your response to Special Interrogatory No. 17.

13 **RESPONSE TO SPECIAL INTERROGATORY NO. 19:**

14 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
15 in full. Further:

16 Responding Party incorporates its objections to Special Interrogatory No. 17 as if set forth in
17 full.

18 Responding Party objects that the interrogatory is vague and ambiguous as to the undefined term
19 "Identify."

20 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

21 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
22 attorney-privileged communications or attorney work-product.

23 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
24 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
25 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
26 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.
27
28

1 Responding Party objects to this interrogatory on the grounds that it seeks documents or
2 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
3 evidence.

4 **AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 19:**

5 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
6 in full. Further:

7 Responding Party incorporates its objections to Special Interrogatory No. 17 as if set forth in
8 full.

9 Responding Party objects that the interrogatory is vague and ambiguous as to the undefined term
10 “Identify.”

11 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

12 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
13 attorney-privileged communications or attorney work-product.

14 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
15 burdensome, oppressive, and premature (including because of James P. Spears’s failure to cooperate in
16 discovery in this matter) to the extent it seeks information outside of Responding Party’s possession,
17 custody, and control, and/or particularly within James P. Spears’s possession, custody, and control.

18 Responding Party objects to this interrogatory on the grounds that it seeks documents or
19 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
20 evidence.

21 Subject to the Preliminary Statement and General Objections, each of which is incorporated
22 herein as though set forth in full, and the foregoing, Responding Party refers James Spears to the
23 Declaration of Sherine Ebadi and documents that will be produced and/or made available for inspection
24 by Kroll; reference is made to the forthcoming production to be made by Kroll pursuant to subpoena and
25 Kroll’s responses/supplemental responses and objections thereto.

26 **SPECIAL INTERROGATORY NO. 20:**

27 State all facts supporting any contention by you that: “over the course of the Conservatorship,
28 only a relatively-small proportion of Ms. Spears’s earnings were actually retained by the Estate and

Ms. Spears, with vast sums of disbursements.” *See, e.g.,* BRITNEY’S JANUARY 2022 FEE PETITION OBJECTIONS at ¶ 93.

RESPONSE TO SPECIAL INTERROGATORY NO. 20:

Responding Party incorporates the Preliminary Statement and General Objections as if set forth in full. Further:

Responding Party objects to this interrogatory as overbroad, unduly burdensome, oppressive, and disproportional to the needs of the case to the extent it purports to require the Responding Party to provide a narrative response “[s]tat[ing] all facts supporting” a contention. In responding to the interrogatory, Responding Party will interpret it as seeking only the material facts supporting the contention.

Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

Responding Party objects to this interrogatory to the extent it seeks to uncover the content of attorney-privileged communications or attorney work-product.

Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly burdensome, oppressive, and premature (including because of James P. Spears’s failure to cooperate in discovery in this matter) to the extent it seeks information outside of Responding Party’s possession, custody, and control, and/or particularly within James P. Spears’s possession, custody, and control.

Responding Party objects to this interrogatory on the grounds that it seeks documents or information that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 20:

Responding Party incorporates the Preliminary Statement and General Objections as if set forth in full. Further:

Responding Party objects to this interrogatory as overbroad, unduly burdensome, oppressive, and disproportional to the needs of the case to the extent it purports to require the Responding Party to provide a narrative response “[s]tat[ing] all facts supporting” a contention. In responding to the interrogatory, Responding Party will interpret it as seeking only the material facts supporting the contention.

1 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

2 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
3 attorney-privileged communications or attorney work-product.

4 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
5 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
6 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
7 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

8 Responding Party objects to this interrogatory on the grounds that it seeks documents or
9 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
10 evidence.

11 Subject to the Preliminary Statement and General Objections, each of which is incorporated
12 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

13 Mr. Spears has already paid himself more than \$6 million for occupying the role of Conservator,
14 all while mismanaging the Estate. (Ebadi Decl. ¶ 82.) More generally, over the course of the
15 Conservatorship, only a relatively small proportion of Ms. Spears's earnings were actually retained by
16 the Estate and Ms. Spears, with vast sums of disbursements. Based upon Kroll's analysis of
17 QuickBooks data from Tri Star, the revenue generated by the Estate was not, on a relative basis,
18 significantly more than the disbursements and expenses paid out by Ms. Spears to third parties. (Ebadi
19 Decl. ¶ 80.)

20 **SPECIAL INTERROGATORY NO. 21:**

21 Identify all persons (by name, phone number, and address) with knowledge of the facts relating
22 to any contention by you that: "over the course of the Conservatorship, only a relatively-small
23 proportion of Ms. Spears's earnings were actually retained by the Estate and Ms. Spears, with vast sums
24 of disbursements." *See, e.g.,* BRITNEY'S JANUARY 2022 FEE PETITION OBJECTIONS at ¶ 93.

25 **RESPONSE TO SPECIAL INTERROGATORY NO. 21:**

26 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
27 in full. Further:

28 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

1 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
2 attorney-privileged communications or attorney work-product.

3 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
4 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
5 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
6 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

7 Responding Party objects to this interrogatory on the grounds that it seeks documents or
8 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
9 evidence.

10 Responding Party objects to the extent the interrogatory seeks confidential or private information
11 about persons who are not parties to this case, and without notice to said parties.

12 **AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 21:**

13 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
14 in full. Further:

15 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

16 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
17 attorney-privileged communications or attorney work-product.

18 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
19 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
20 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
21 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

22 Responding Party objects to this interrogatory on the grounds that it seeks documents or
23 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
24 evidence.

25 Responding Party objects to the extent the interrogatory seeks confidential or private information
26 about persons who are not parties to this case, and without notice to said parties.

1 Subject to the Preliminary Statement and General Objections, each of which is incorporated
2 herein as though set forth in full, and the foregoing, Responding Party identifies Mr. Spears, his counsel,
3 Tri Star, and Sherine Ebadi.

4 **SPECIAL INTERROGATORY NO. 22:**

5 Identify all DOCUMENTS supporting your response to Special Interrogatory No. 20.

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 22:**

7 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
8 in full. Further:

9 Responding Party incorporates its objections to Special Interrogatory No. 20 as if set forth in
10 full.

11 Responding Party objects that the interrogatory is vague and ambiguous as to the undefined term
12 “Identify.”

13 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

14 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
15 attorney-privileged communications or attorney work-product.

16 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
17 burdensome, oppressive, and premature (including because of James P. Spears’s failure to cooperate in
18 discovery in this matter) to the extent it seeks information outside of Responding Party’s possession,
19 custody, and control, and/or particularly within James P. Spears’s possession, custody, and control.

20 Responding Party objects to this interrogatory on the grounds that it seeks documents or
21 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
22 evidence.

23 **AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 22:**

24 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
25 in full. Further:

26 Responding Party incorporates its objections to Special Interrogatory No. 20 as if set forth in
27 full.

1 Responding Party objects that the interrogatory is vague and ambiguous as to the undefined term
2 “Identify.”

3 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

4 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
5 attorney-privileged communications or attorney work-product.

6 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
7 burdensome, oppressive, and premature (including because of James P. Spears’s failure to cooperate in
8 discovery in this matter) to the extent it seeks information outside of Responding Party’s possession,
9 custody, and control, and/or particularly within James P. Spears’s possession, custody, and control.

10 Responding Party objects to this interrogatory on the grounds that it seeks documents or
11 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
12 evidence.

13 Subject to the Preliminary Statement and General Objections, each of which is incorporated
14 herein as though set forth in full, and the foregoing, Responding Party refers James Spears to the
15 Declaration of Sherine Ebadi and documents that will be produced and/or made available for inspection
16 by Kroll; reference is made to the forthcoming production to be made by Kroll pursuant to subpoena and
17 Kroll’s responses/supplemental responses and objections thereto.

18 **SPECIAL INTERROGATORY NO. 23:**

19 State all facts supporting any contention that: “[t]he Black Box employee who placed the secret
20 device in Ms. Spears’s bedroom explained to Mr. Vlasov that he did so by duct-taping it behind
21 furniture so it could not be seen, and that he added a separate battery pack to the recording device to
22 permit continuous recording for a longer period of time.” *See, e.g.,* Declaration Of Sherine Ebadi In
23 Support Of Objections And Opposition To The Petition By James P. Spears For Order Regarding
24 Payment From Britney Spears filed January 14, 2022 in Los Angeles Superior Court case number
25 BP108870 (“EBADI DECLARATION”) at ¶ 38.

26 **RESPONSE TO SPECIAL INTERROGATORY NO. 23:**

27 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
28 in full. Further:

1 Responding Party objects to this interrogatory as overbroad, unduly burdensome, oppressive, and
2 disproportional to the needs of the case to the extent it purports to require the Responding Party to
3 provide a narrative response “[s]tat[ing] all facts supporting” a contention. In responding to the
4 interrogatory, Responding Party will interpret it as seeking only the material facts supporting the
5 contention.

6 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

7 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
8 attorney-privileged communications or attorney work-product.

9 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
10 burdensome, oppressive, and premature (including because of James P. Spears’s failure to cooperate in
11 discovery in this matter) to the extent it seeks information outside of Responding Party’s possession,
12 custody, and control, and/or particularly within James P. Spears’s possession, custody, and control.

13 Responding Party objects to this interrogatory on the grounds that it seeks documents or
14 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
15 evidence.

16 **AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 23:**

17 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
18 in full. Further:

19 Responding Party objects to this interrogatory as overbroad, unduly burdensome, oppressive, and
20 disproportional to the needs of the case to the extent it purports to require the Responding Party to
21 provide a narrative response “[s]tat[ing] all facts supporting” a contention. In responding to the
22 interrogatory, Responding Party will interpret it as seeking only the material facts supporting the
23 contention.

24 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

25 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
26 attorney-privileged communications or attorney work-product.

27 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
28 burdensome, oppressive, and premature (including because of James P. Spears’s failure to cooperate in

discovery in this matter) to the extent it seeks information outside of Responding Party's possession, custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

Responding Party objects to this interrogatory on the grounds that it seeks documents or information that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to the Preliminary Statement and General Objections, each of which is incorporated herein as though set forth in full, and the foregoing, Responding Party responds as follows:

Mr. Vlasov learned of the bedroom surveillance in or around 2018, when Mr. Yemini and a fellow Black Box employee asked him to wipe (eliminate) the contents of a USB drive connected to a digital recording device. The digital recording device had an SD (Digital Memory) card, a battery pack attached to it, and was covered in duct tape. According to Mr. Vlasov, Mr. Spears "loved" the idea of eavesdropping on his daughter and approved and directed the installation. Later, a Black Box employee told Mr. Vlasov that he and Mr. Yemini had listened to the recordings and found nothing "useful." (Ebadi Decl. ¶ 38.)

SPECIAL INTERROGATORY NO. 24:

Identify all persons (by name, phone number, and address) with knowledge of the facts relating to the contention that: "[t]he Black Box employee who placed the secret device in Ms. Spears's bedroom explained to Mr. Vlasov that he did so by duct-taping it behind furniture so it could not be seen, and that he added a separate battery pack to the recording device to permit continuous recording for a longer period of time." *See, e.g.,* EBADI DECLARATION at ¶ 38.

RESPONSE TO SPECIAL INTERROGATORY NO. 24:

Responding Party incorporates the Preliminary Statement and General Objections as if set forth in full. Further:

Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

Responding Party objects to this interrogatory to the extent it seeks to uncover the content of attorney-privileged communications or attorney work-product.

Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in

1 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
2 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

3 Responding Party objects to this interrogatory on the grounds that it seeks documents or
4 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
5 evidence.

6 Responding Party objects to the extent the interrogatory seeks confidential or private information
7 about persons who are not parties to this case, and without notice to said parties.

8 **AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 24:**

9 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
10 in full. Further:

11 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

12 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
13 attorney-privileged communications or attorney work-product.

14 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
15 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
16 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
17 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

18 Responding Party objects to this interrogatory on the grounds that it seeks documents or
19 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
20 evidence.

21 Responding Party objects to the extent the interrogatory seeks confidential or private information
22 about persons who are not parties to this case, and without notice to said parties.

23 Subject to the Preliminary Statement and General Objections, each of which is incorporated
24 herein as though set forth in full, and the foregoing, Responding Party identifies Mr. Spears, his counsel,
25 Edan Yemini, Alex Vlasov, and Sherine Ebadi.

26 **SPECIAL INTERROGATORY NO. 25:**

27 Identify all DOCUMENTS supporting your response to Special Interrogatory No. 23.
28

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 25:**

2 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
3 in full. Further:

4 Responding Party incorporates its objections to Special Interrogatory No. 23 as if set forth in
5 full.

6 Responding Party objects that the interrogatory is vague and ambiguous as to the undefined term
7 “Identify.”

8 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

9 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
10 attorney-privileged communications or attorney work-product.

11 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
12 burdensome, oppressive, and premature (including because of James P. Spears’s failure to cooperate in
13 discovery in this matter) to the extent it seeks information outside of Responding Party’s possession,
14 custody, and control, and/or particularly within James P. Spears’s possession, custody, and control.

15 Responding Party objects to this interrogatory on the grounds that it seeks documents or
16 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
17 evidence.

18 **AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 25:**

19 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
20 in full. Further:

21 Responding Party incorporates its objections to Special Interrogatory No. 23 as if set forth in
22 full.

23 Responding Party objects that the interrogatory is vague and ambiguous as to the undefined term
24 “Identify.”

25 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

26 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
27 attorney-privileged communications or attorney work-product.

1 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
2 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
3 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
4 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

5 Responding Party objects to this interrogatory on the grounds that it seeks documents or
6 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
7 evidence.

8 Subject to the Preliminary Statement and General Objections, each of which is incorporated
9 herein as though set forth in full, and the foregoing, Responding Party refers James Spears to the
10 Declaration of Sherine Ebadi and documents that will be produced and/or made available for inspection
11 by Kroll; reference is made to the forthcoming production to be made by Kroll pursuant to subpoena and
12 Kroll's responses/supplemental responses and objections thereto.

13 **SPECIAL INTERROGATORY NO. 26:**

14 State all facts supporting any contention by you that: James P. Spears broke "a huge door down
15 to get to [your] son and [shook] him." *See, e.g.,* Reporter's Transcript of Proceedings dated July 14,
16 2021 in Los Angeles Superior Court case number BP108870 ("JULY 14, 2021 HEARING
17 TRANSCRIPT") at 26:14-18.

18 **RESPONSE TO SPECIAL INTERROGATORY NO. 26:**

19 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
20 in full. Further:

21 Responding Party objects to this interrogatory as overbroad, unduly burdensome, oppressive, and
22 disproportional to the needs of the case to the extent it purports to require the Responding Party to
23 provide a narrative response "[s]tat[ing] all facts supporting" a contention. In responding to the
24 interrogatory, Responding Party will interpret it as seeking only the material facts supporting the
25 contention.

26 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

27 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
28 attorney-privileged communications or attorney work-product.

1 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
2 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
3 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
4 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

5 Responding Party objects to this interrogatory on the grounds that it seeks documents or
6 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
7 evidence.

8 **AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 26:**

9 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
10 in full. Further:

11 Responding Party objects to this interrogatory as overbroad, unduly burdensome, oppressive, and
12 disproportional to the needs of the case to the extent it purports to require the Responding Party to
13 provide a narrative response "[s]tat[ing] all facts supporting" a contention. In responding to the
14 interrogatory, Responding Party will interpret it as seeking only the material facts supporting the
15 contention.

16 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

17 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
18 attorney-privileged communications or attorney work-product.

19 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
20 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
21 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
22 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

23 Responding Party objects to this interrogatory on the grounds that it seeks documents or
24 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
25 evidence.

26 Subject to the Preliminary Statement and General Objections, each of which is incorporated
27 herein as though set forth in full, and the foregoing, Responding Party responds as follows:
28

1 These facts are within the possession, custody, and control of Mr. Spears and apparent in
2 confidential court records and those already in Mr. Spears's possession, custody, and control.

3 **SPECIAL INTERROGATORY NO. 27:**

4 Identify all persons (by name, phone number, and address) with knowledge of the facts relating
5 to any contention by you that: James P. Spears broke "a huge door down to get to [your] son and
6 [shook] him." *See, e.g.*, JULY 14, 2021 HEARING TRANSCRIPT at 26:14-18.

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 27:**

8 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
9 in full. Further:

10 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

11 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
12 attorney-privileged communications or attorney work-product.

13 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
14 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
15 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
16 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

17 Responding Party objects to this interrogatory on the grounds that it seeks documents or
18 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
19 evidence.

20 Responding Party objects to the extent the interrogatory seeks confidential or private information
21 about persons who are not parties to this case, and without notice to said parties.

22 **AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 27:**

23 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
24 in full. Further:

25 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

26 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
27 attorney-privileged communications or attorney work-product.

1 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
2 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
3 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
4 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

5 Responding Party objects to this interrogatory on the grounds that it seeks documents or
6 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
7 evidence.

8 Responding Party objects to the extent the interrogatory seeks confidential or private information
9 about persons who are not parties to this case, and without notice to said parties.

10 Subject to the Preliminary Statement and General Objections, each of which is incorporated
11 herein as though set forth in full, and the foregoing, Responding Party identifies Mr. Spears.

12 **SPECIAL INTERROGATORY NO. 28:**

13 Identify all DOCUMENTS supporting your response to Special Interrogatory No. 26.

14 **RESPONSE TO SPECIAL INTERROGATORY NO. 28:**

15 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
16 in full. Further:

17 Responding Party incorporates its objections to Special Interrogatory No. 26 as if set forth in
18 full.

19 Responding Party objects that the interrogatory is vague and ambiguous as to the undefined term
20 "Identify."

21 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

22 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
23 attorney-privileged communications or attorney work-product.

24 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
25 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
26 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
27 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

1 Responding Party objects to this interrogatory on the grounds that it seeks documents or
2 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
3 evidence.

4 **AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 28:**

5 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
6 in full. Further:

7 Responding Party incorporates its objections to Special Interrogatory No. 26 as if set forth in
8 full.

9 Responding Party objects that the interrogatory is vague and ambiguous as to the undefined term
10 “Identify.”

11 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

12 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
13 attorney-privileged communications or attorney work-product.

14 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
15 burdensome, oppressive, and premature (including because of James P. Spears’s failure to cooperate in
16 discovery in this matter) to the extent it seeks information outside of Responding Party’s possession,
17 custody, and control, and/or particularly within James P. Spears’s possession, custody, and control.

18 Responding Party objects to this interrogatory on the grounds that it seeks documents or
19 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
20 evidence.

21 Subject to the Preliminary Statement and General Objections, each of which is incorporated
22 herein as though set forth in full, and the foregoing, Responding Party refers James Spears to documents
23 in confidential court records and Mr. Spears’s possession, custody, and control.

24 **SPECIAL INTERROGATORY NO. 29:**

25 State all facts supporting any contention by you that: James P. Spears should be charged “for
26 conservatorship abuse.” *See, e.g.*, JULY 14, 2021 HEARING TRANSCRIPT at 26:13-14.

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 29:**

2 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
3 in full. Further:

4 Responding Party objects to this interrogatory as overbroad, unduly burdensome, oppressive, and
5 disproportional to the needs of the case to the extent it purports to require the Responding Party to
6 provide a narrative response “[s]tat[ing] all facts supporting” a contention. In responding to the
7 interrogatory, Responding Party will interpret it as seeking only the material facts supporting the
8 contention.

9 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

10 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
11 attorney-privileged communications or attorney work-product.

12 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
13 burdensome, oppressive, and premature (including because of James P. Spears’s failure to cooperate in
14 discovery in this matter) to the extent it seeks information outside of Responding Party’s possession,
15 custody, and control, and/or particularly within James P. Spears’s possession, custody, and control.

16 Responding Party objects to this interrogatory on the grounds that it seeks documents or
17 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
18 evidence.

19 **AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 29:**

20 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
21 in full. Further:

22 Responding Party objects to this interrogatory as overbroad, unduly burdensome, oppressive, and
23 disproportional to the needs of the case to the extent it purports to require the Responding Party to
24 provide a narrative response “[s]tat[ing] all facts supporting” a contention. In responding to the
25 interrogatory, Responding Party will interpret it as seeking only the material facts supporting the
26 contention.

27 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.
28

1 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
2 attorney-privileged communications or attorney work-product.

3 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
4 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
5 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
6 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

7 Responding Party objects to this interrogatory on the grounds that it seeks documents or
8 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
9 evidence.

10 Subject to the Preliminary Statement and General Objections, each of which is incorporated
11 herein as though set forth in full, and the foregoing, Responding Party incorporates the responses
12 provided in her First Amended Responses to James P. Spears's Form Interrogatories (Set One),
13 Response to Form Interrogatory No. 17.1, and responses to these Special Interrogatories (Set One).

14 **SPECIAL INTERROGATORY NO. 30:**

15 Identify all persons (by name, phone number, and address) with knowledge of the facts relating
16 to any contention by you that: James P. Spears should be charged "for conservatorship abuse." *See*,
17 *e.g.*, JULY 14, 2021 HEARING TRANSCRIPT at 26:13-14.

18 **RESPONSE TO SPECIAL INTERROGATORY NO. 30:**

19 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
20 in full. Further:

21 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

22 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
23 attorney-privileged communications or attorney work-product.

24 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
25 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
26 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
27 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.
28

1 Responding Party objects to this interrogatory on the grounds that it seeks documents or
2 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
3 evidence.

4 Responding Party objects to the extent the interrogatory seeks confidential or private information
5 about persons who are not parties to this case, and without notice to said parties.

6 **AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 30:**

7 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
8 in full. Further:

9 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

10 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
11 attorney-privileged communications or attorney work-product.

12 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
13 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
14 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
15 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

16 Responding Party objects to this interrogatory on the grounds that it seeks documents or
17 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
18 evidence.

19 Responding Party objects to the extent the interrogatory seeks confidential or private information
20 about persons who are not parties to this case, and without notice to said parties.

21 Subject to the Preliminary Statement and General Objections, each of which is incorporated
22 herein as though set forth in full, and the foregoing, Responding Party identifies Mr. Spears, his counsel,
23 Alex Vlasov, Sherine Ebadi, Edan Yemini, Lou Taylor, Robin Greenhill, Lynne Spears, Tish Yates, and
24 Dan George.

25 **SPECIAL INTERROGATORY NO. 31:**

26 Identify all DOCUMENTS supporting your response to Special Interrogatory No. 29.
27
28

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 31:**

2 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
3 in full. Further:

4 Responding Party incorporates its objections to Special Interrogatory No. 29 as if set forth in
5 full.

6 Responding Party objects that the interrogatory is vague and ambiguous as to the undefined term
7 “Identify.”

8 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

9 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
10 attorney-privileged communications or attorney work-product.

11 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
12 burdensome, oppressive, and premature (including because of James P. Spears’s failure to cooperate in
13 discovery in this matter) to the extent it seeks information outside of Responding Party’s possession,
14 custody, and control, and/or particularly within James P. Spears’s possession, custody, and control.

15 Responding Party objects to this interrogatory on the grounds that it seeks documents or
16 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
17 evidence.

18 **AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 31:**

19 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
20 in full. Further:

21 Responding Party incorporates its objections to Special Interrogatory No. 29 as if set forth in
22 full.

23 Responding Party objects that the interrogatory is vague and ambiguous as to the undefined term
24 “Identify.”

25 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

26 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
27 attorney-privileged communications or attorney work-product.

1 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
2 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
3 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
4 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

5 Responding Party objects to this interrogatory on the grounds that it seeks documents or
6 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
7 evidence.

8 Subject to the Preliminary Statement and General Objections, each of which is incorporated
9 herein as though set forth in full, and the foregoing, Responding Party refers James Spears to the
10 Declaration of Sherine Ebadi and documents that will be produced and/or made available for inspection
11 by Kroll; reference is made to the forthcoming production to be made by Kroll pursuant to subpoena and
12 Kroll's responses/supplemental responses and objections thereto.

13 **SPECIAL INTERROGATORY NO. 32:**

14 Identify all moneys James P. Spears received from your estate in total and on a monthly basis
15 from the inception of the Conservatorship through the termination of the Conservatorship.

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 32:**

17 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
18 in full. Further:

19 Responding Party objects that the interrogatory is vague and ambiguous as to the undefined
20 terms "Identify," "moneys," and "received."

21 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

22 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
23 attorney-privileged communications or attorney work-product.

24 Responding Party objects to this interrogatory as premature to the extent it seeks expert opinions
25 or testimony.

26 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
27 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
28

1 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
2 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

3 Responding Party objects to this interrogatory on the grounds that it seeks documents or
4 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
5 evidence.

6 **AMENDED RESPONSE TO SPECIAL INTERROGATORY NO. 32:**

7 Responding Party incorporates the Preliminary Statement and General Objections as if set forth
8 in full. Further:

9 Responding Party objects that the interrogatory is vague and ambiguous as to the undefined
10 terms "Identify," "moneys," and "received."

11 Responding Party objects to the extent the interrogatory seeks a legal conclusion or opinion.

12 Responding Party objects to this interrogatory to the extent it seeks to uncover the content of
13 attorney-privileged communications or attorney work-product.

14 Responding Party objects to this interrogatory as premature to the extent it seeks expert opinions
15 or testimony.

16 Responding Party objects that the interrogatory is vague, ambiguous, overbroad, unduly
17 burdensome, oppressive, and premature (including because of James P. Spears's failure to cooperate in
18 discovery in this matter) to the extent it seeks information outside of Responding Party's possession,
19 custody, and control, and/or particularly within James P. Spears's possession, custody, and control.

20 Responding Party objects to this interrogatory on the grounds that it seeks documents or
21 information that are neither relevant nor reasonably calculated to lead to the discovery of admissible
22 evidence.

23 Subject to the Preliminary Statement and General Objections, each of which is incorporated
24 herein as though set forth in full, and the foregoing, Responding Party responds as follows:

25 While this information is uniquely available to James P. Spears and set forth in the above-
26 referenced Quick Books materials obtained from Tri Star, Responding Party is informed Kroll has been
27 unable, to date, to independently verify the amounts that Mr. Spears caused to be distributed from the
28 Estate, in part because of the manner in which the Conservatorship finances were disclosed. The public

1 portions of the accountings themselves expressly note their limitations. For example, in addition to the
2 lack of detail in the accountings themselves, the publicly filed Twelfth Account Current states in
3 Paragraph 9.a that the “Conservatee’s business consists of approximately ten to fifteen entities (wholly
4 owned by the Conservatee) and involves literally many thousands of transactions, including between
5 and among the entities,” and “it would be impractical to fit the business activities and transactions [of
6 Ms. Spears] into the form of the traditional accounting.” Redacted Twelfth Account Current ¶ 9 (filed
7 Aug. 2020). Paragraph 9.b goes on to caveat, “Due to the complexities and volume of information
8 relating to the Conservatee’s business activities, the Twelfth Account diverges from a traditional probate
9 account” Paragraph 9.d continues, “The business activity is reported to the Court in Schedule F of
10 Exhibit 1. Schedule F contains separate independent accountings for each entity. The business activity
11 of the individual entities is not incorporated into the Summary of Account.” And Paragraph 9.e
12 provides, “Most of the active entities were formed after the Conservatorship was established and
13 therefore are not reflected in the Inventories. The entities created after the Conservatorship was
14 established are also not reflected in the Schedule of Property on Hand at the End of Account Period for
15 the reasons set forth in this paragraph.”
16

17 DATED: June 14, 2022

GREENBERG TRAURIG, LLP

18
19 By /s/ Mathew S. Rosengart
20 Mathew S. Rosengart
21 Attorneys for Britney Jean Spears
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23
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25
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28

1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA**

3 **COUNTY OF LOS ANGELES**

4 I am employed in the aforesaid county, State of California; I am over the age of 18 years and not a
5 party to the within action; my business address is **1840 Century Park East, Suite 1900, Los Angeles,**
6 **CA 90067-2121.**

7 On June 14, 2022, I caused the document described as **BRITNEY JEAN SPEARS'S FIRST**
8 **AMENDED RESPONSE TO FIRST SET OF SPECIAL INTERROGATORIES FROM JAMES P.**
9 **SPEARS** to be transmitted to the addressee(s) listed on the attached Service List:

10 ☒ **(BY E-SERVICE)** I caused the document(s) to be sent to the person(s) at the e-mail address(es)
11 indicated on the attached service list.

12 ☒ **(STATE)** I declare under penalty of perjury under the laws of the State of California that the
13 foregoing is true and correct.

14 Executed on June 14, 2022, at Los Angeles, California.

15 /s/ Heather J. Silver
16 Heather J. Silver
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**SERVICE LIST
CASE BP108870**

Alex Weingarten Willkie Farr & Gallagher, LLP 2029 Century Park East, Suite 400 Los Angeles, CA 90067 Email; aweingarten@willkie.com ebakewell@willkie.com Tel: 310-855-3000/Fax: 310-855-3099	Attorneys for James P. Spears Suspended Conservator of the Estate
Vivian L. Thoreen Jonathan H. Park HOLLAND & KNIGHT, LLP 400 S. Hope Street, 8th Floor Los Angeles, CA 90071 Tel: 213-896-2400/ Fax: 213-896-2450 Email: vivian.thoreen@hklaw.com jonathan.park@hklaw.com	Former Attorneys for James P. Spears, Suspended Conservator of the Estate
Geraldine A. Wyle Jeryll S. Cohen FREEMAN FREEMAN & SMILEY, LLP 1888 Century Park East, Suite 1500 Los Angeles, CA 90067 Email: Geraldine.wyle@ffslaw.com Jeryll.cohen@ffslaw.com	Former Attorneys for James P. Spears, Suspended Conservator of the Estate
Yasha Bronshteyn GINZBURG & BRONSHTEYN, LLP 11111 Santa Monica Blvd., Suite. 1840 Los Angeles CA 90025 Tel: 310-914-3222 Email: yasha@gblp-law.com	Attorneys for Lynne Spears, Mother of Former Conservatee
Gladstone N. Jones, III Lynn E. Swanson JONES SWANSON HUDDALL & GARRISON, LLC Pan-American Life Center 601 Poydras Street, Suite 2655 New Orleans, LA 70130 Tel: 504-523-2500 Email: gjones@jonesswanson.com; lswanson@jonesswanson.com	Attorneys for Lynne Spears, Mother of Former Conservatee

Lauriann C. Wright Marie Mondia WRIGHT KIM DOUGLAS, ALC 130 S. Jackson Street Glendale, CA 91205-1123 Tel: 626-356-3900 Email: lauriann@wkdlegal.com marie@wkdlegal.com	Attorneys for Jodi Montgomery
--	-------------------------------

Exhibit 3

GREENBERG TRAURIG, LLP

MATHEW S. ROSENGART (SBN 255750) (*RosengartM@gtlaw.com*)

SCOTT D. BERTZYK (SBN 116449) (*BertzysS@gtlaw.com*)

MATTHEW R. GERSHMAN (SBN 253031) (*GershmanM@gtlaw.com*)

LISA C. MCCURDY (SBN 228755) (*McCurdyL@gtlaw.com*)

KYLE FREENY (SBN 247857) (*FreenyK@gtlaw.com*)

1840 Century Park East, Suite 1900

Los Angeles, CA 90067-2121

Tel: 310-586-3889

Fax: 310-586-7800

Attorneys for Britney Jean Spears

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES, CENTRAL DISTRICT

In re the Conservatorship of the Person and
Estate of BRITNEY JEAN SPEARS

Case No. BP108870

Hon. Brenda J. Penny, Dept. 4

**BRITNEY JEAN SPEARS'S NOTICE OF
MOTION AND MOTION TO COMPEL
DEPOSITION OF JAMES P. SPEARS;
MEMORANDUM OF POINTS AND
AUTHORITIES**

[Filed concurrently with Declaration of Mathew S.
Rosengart; and Proposed Order]

Date: July 13, 2022 (Date approved by Court Clerk)

Time: 1:30 p.m.

Dept: 4

1 **TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that on July 13, 2022 at 1:30 p.m, or as soon thereafter as the matter
3 may be heard in Department 4 of the above-captioned Court, located at 111 North Hill Street, Los
4 Angeles, California 90012, Britney Jean Spears will and hereby does move, pursuant to California Code
5 of Civil Procedure sections 2025.280, and 2025.450 *et seq.*, for an order compelling James P. Spears to
6 appear for deposition at a date and time set by the Court, promptly after the motion is heard.¹

7 Good cause exists to grant this Motion because James P. Spears's deposition was first noticed for
8 October 20, 2021, and despite two subsequent Notices, Mr. Spears still has not appeared for his
9 deposition, has not agreed to any of the numerous deposition dates proposed in a good faith effort to
10 accommodate him and his counsel, and has not volunteered any available dates for his deposition.

11 Mr. Spears can run, but he cannot forever hide from his legal and fiduciary obligations. His
12 stonewalling and obfuscation must not stop the truth from coming to light; it has only required that the
13 parties expend unnecessary resources in a protracted battle to obtain his compliance. But, after using his
14 daughter's money for more than 13 years to fund his legal fees and expenses, for the first time, Mr.
15 Spears will now have to pay his own legal fees. (See *People ex rel. Harris v. Shine* (2017) 16
16 Cal.App.5th 524, 540; *Conservatorship of Lefkowitz* (1996) 50 Cal.App.4th 1310, 1316-1317.)

17 Counsel for Britney Spears engaged in extensive meet-and-confer discussions with counsel for
18 Mr. Spears, over many months. Mr. Spears failed to appear for depositions that were noticed for October
19 20, 2021, November 10, 2021, and April 6, 2022. Most recently, by letters dated April 26 and May 2,
20 2022, counsel for Ms. Spears offered no fewer than eight dates for Mr. Spears's deposition, with more
21 than one month's notice: June 3, 7, 8, 9, 10, 14, 15, or 16. Mr. Spears's counsel failed to accept any of
22 these dates; nor did he offer any alternative dates. Based on the above, it is evident that Mr. Spears will
23 not voluntarily sit for his deposition and that he must be compelled to do so.

24 This Motion, necessitated by the above, is based upon this Notice of Motion, the accompanying
25 Memorandum of Points and Authorities, the Declaration of Mathew S. Rosengart and exhibits, the
26

27 _____
28 ¹ Ms. Spears expressly reserves all rights to bring an additional motion to compel Mr. Spears to produce documents at or
before his deposition and to expedite the hearing on this Motion.

1 pleadings, papers and other documents on file in this matter, all matters upon which judicial notice may
2 be taken, and the argument of counsel at the time of oral argument at the hearing on this Motion.

3
4 Dated: May 25, 2022

Respectfully Submitted,

5 GREENBERG TRAURIG, LLP

6
7 By: /s Mathew S. Rosengart
8 Attorneys for Britney Jean Spears
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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. PRELIMINARY STATEMENT AND SUMMARY OF ARGUMENT**

3 Despite his demonstrably false claims that he has “nothing to hide” and would therefore “hide
4 nothing,”² James P. Spears has been running and hiding from his deposition and accounting for his
5 misconduct—under oath—as required by law. Indeed, while representing that he would “unconditionally
6 cooperate” and act with “complete transparency without conditions,” Mr. Spears has engaged in
7 stonewalling and obstruction—for over six months—dodging his deposition and repeatedly failing to
8 respond to simple requests for basic information, including the following, among others:

- 9 • “What were the total fees obtained or received by James Spears (or any entity in which he
10 had any interest) from Britney Spears or the Estate?”
11 • “What were the total fees obtained or received by Tri Star Sports & Entertainment (or any
12 of its affiliates) from Britney Spears or the Estate?”

13 Mr. Spears has also failed, among other things, to produce communications concerning the
14 shocking electronic surveillance apparatus set up to spy on his daughter, including those involving (i) his
15 or his team’s contemporaneous, real-time capturing and monitoring of Ms. Spears’s private
16 communications with third parties—including *sacrosanct, privileged communications with her prior*
17 *counsel*, and (ii) placing a bug in his daughter’s bedroom. As a suspended conservator, Mr. Spears is
18 legally required to produce all such email and text message communications, including communications
19 with his counsel.³

20 Further, despite (i) running a corrupted and conflicted conservatorship that stripped his daughter
21 of certain fundamental liberties; (ii) enriching himself from the conservatorship by reaping at least \$6.3
22 million from it while paying his associates tens of millions more;⁴ and (iii) being suspended from his

23 ² See James P. Spears November 1, 2021 “Status Report;” see also November 5, 2021 email to Mr. Spears’s counsel Alex
24 Weingarten and October 25 and November 2, 2021 letters to Tri Star’s counsel, copies of which are annexed to the Rosengart
Declaration as Exhibits I and J, respectively.

25 ³ See *Stine v. Dell’Osso* (2014) 230 Cal.App.4th 834, 843; *Moeller v. Superior Court* (1997) 16 Cal.4th 1124, 1129-1135; see
26 also Cal. Probate Code, § 8524, subd. (c); Day and Stark, *The Surveillance Apparatus That Surrounded Britney Spears*, *The*
New York Times (Sept. 24, 2021), a copy of which is annexed to the Rosengart Declaration as Exhibit L.

27 ⁴ This figure is based upon Quick Books data obtained by Kroll Associates, Inc. Mr. Spears has failed and refused to
28 separately answer this direct question and due to his failure to cooperate, Kroll cannot at this time independently verify the
accuracy of the figure.

1 post on September 29, 2021, Mr. Spears continues to harass and bully Britney Spears by, among other
2 things, failing to cooperate with his discovery and fiduciary obligations and serving intrusive and abusive
3 discovery on his own daughter. Even worse, despite the prior trauma Ms. Spears has endured, Mr.
4 Spears is now seeking to take his daughter's deposition (*his own daughter's deposition*), even as he
5 hides from answering essential deposition questions concerning, among other things, the substantial pre-
6 conservatorship loan he obtained from Tri Star and whether it was used to implement the
7 conservatorship, *see infra* at 10-11; any and all other actual or apparent conflicts of interest; efforts to
8 control his daughter via lithium; the spying operation alleged and exposed by a whistleblower and *The*
9 *New York Times*; how many of his daughter's private, attorney-client privileged communications were
10 contemporaneously captured and read, and to what end; all payments to Tri Star, Black Box Security and
11 other third parties from his daughter's Estate; the purposes of all such payments, and whether those
12 purposes were concealed from the Court; the total sums he paid himself and others; the use or diversion
13 of conservatorship resources for his own benefit; charging the Estate for certain costs or fees including
14 payment of Lou Taylor's personal legal fees; using Britney Spears's resources to oppose or suppress the
15 #FreeBritney Movement; and his unexplained use of funds generally and in connection with what the
16 Court correctly identified as the "extraordinarily high expenses" for the Louisiana residence including
17 payments to his son-in-law's company Advanced Media Partners.

18 Specifically, on October 1, 2021, Britney Spears served Mr. Spears's then-counsel at Holland &
19 Knight with a Notice of Deposition, setting the deposition for October 20, 2021. Holland & Knight
20 requested an extension but failed to object to the Notice. The extension was granted as a courtesy, based
21 upon the understanding that Mr. Spears would abide by his legal and fiduciary obligations and appear, to
22 account for his conduct under oath, on cross examination. Despite two other noticed depositions
23 requiring him to appear for deposition on November 10, 2021 and then April 6, 2022, Mr. Spears still has
24 failed to do so.

25 Most recently, in an effort to resolve the issue, by email dated May 2, 2022, Mr. Spears was
26 offered no less than *eight dates* from which he could to appear: June 3, 7, 8, 9, 10, 14, 15, or 16. Mr.
27 Spears failed to select any of these eight dates; nor did he offer any other dates or any justification for his
28 stonewalling. Instead, he in effect sought an improper *quid pro quo*, seeking to barter his deposition for

1 his daughter's. Further, even as he failed to appear for deposition or produce documents and information
2 in a timely, organized, and professional manner (including documents to which he no longer holds any
3 privilege, following his September 29 suspension), Mr. Spears has purported to serve on his daughter 145
4 document requests and more than 75 other discovery requests. This is improper and abusive. Sadly,
5 these tactics represent an effort (indeed, a grotesque and diabolical "strategy") to traumatize and bully his
6 daughter—his own daughter—all in the hopes of intimidating and causing her distress.

7 It has been our honor to represent Britney Spears and to seek to protect her from further trauma,
8 bullying, or abuse, at the hands of her father or others. Whether Mr. Spears's latest ill-advised efforts are
9 the product of cruelty, spite, or just poor judgment, they should cease. Indeed, we submit that a father
10 who truly loved and wished to "protect" his daughter (as Mr. Spears professes) would place his
11 daughter's interests above his own—as a fiduciary is also required to do. Such a father would show
12 grace and decency. *Even if he subjectively disagreed* with the evidence of the trauma and abuse his
13 daughter has endured, and *even if he disagreed* with the specific and credible allegations against him
14 (although he has already been forced to admit to several, including his violations of Rule 7.1059 of the
15 California Rules of Court), that is what a decent man and father would do.

16 First as a father, but also as a fiduciary, Mr. Spears should abide by his legal (and moral)
17 obligations to his daughter. He should cooperate and tell the truth rather than obfuscating and
18 stonewalling. He should stop hiding. He should sit for his deposition and testify under oath. He should
19 waive the Fifth Amendment. He should transfer *all* files in a coherent and organized manner, with Bates
20 labels (including all communications with his counsel during the conservatorship); and he should answer
21 all questions regarding his administration of the conservatorship, including concerning the *Times* expose
22 of illicit surveillance activities. Then, he should finish his final ministerial duties, file the final
23 accounting, and move on. *This* is what a father who truly "loved" his daughter would do. *This* is what a
24 decent man and father would do. And *this* is what Mr. Spears should do—comply with his obligations,
25 leave his daughter alone, and *move on*.

26 Even setting aside Mr. Spears's severe alcoholism (which tainted the conservatorship from the
27 outset), as well as (i) his obvious conflicts of interest in violation of Rule 7.1059 of the California Rules
28 of Court, (ii) the monies he extracted and continues to seek to extract from his daughter, and (iii) his

1 administration of the conservatorship, his cruel and misguided post-conservatorship conduct evokes the
2 statement of attorney Joseph N. Welch during the infamous Army-McCarthy Senate hearings: “*You’ve*
3 *done enough. Have you no sense of decency, sir, at long last? Have you left no sense of decency?*”

4 But regardless of whether he persists in trying to bully, harass, and abuse the legal process against
5 his daughter, there can be no question, as a matter of law, that Mr. Spears must soon sit for his deposition
6 and that, given the above, he now must be compelled to do so.

7 **II. PROCEDURAL HISTORY AND THE PRESENT MOTION**

8 For purposes of this Motion only, certain applicable facts are set forth below. A more complete
9 set of facts is set forth in the record, including in the Declaration of former FBI Special Agent Sherine
10 Ebadi, filed on January 14, 2022, which provides a roadmap of Mr. Spears’s misconduct.⁵ Mr. Spears
11 deposition, if he testifies truthfully, is expected to reveal further misconduct.

12 **A. Brief Summary of Mr. Spears’s Misconduct**

13 It cannot be disputed, and even Mr. Spears does not dispute, that Mr. Spears, who reigned over
14 the conservatorship for 13 years, has crucially-relevant information concerning pending matters. For the
15 limited purposes of this Memorandum and by way of brief illustration only, we focus herein on just a few
16 components of his conduct. *First*, after initially denying it, Mr. Spears’s counsel was forced to admit that
17 in or about 2008, he borrowed a substantial sum of money from a then-fledgling management company
18 called Tri Star Sports & Entertainment (“Tri Star”) and that as of early 2008 when he put his daughter
19 into the conservatorship (the wrong type of conservatorship),⁶ he still owed Tri Star at least \$40,000—a
20 substantial sum of money by 2008 standards, especially for Mr. Spears who had recently filed for
21 Chapter 7 bankruptcy and had no discernible income.

22 Shortly after placing his daughter in the conservatorship, Mr. Spears hired Tri Star as Britney
23 Spears’s business manager and sent his daughter on a grueling 97-show international tour and onto other
24

25 ⁵ See also Objections to James P. Spears Petition for Fees, filed January 14, 2022, a true and correct copy of which is annexed
26 to the Rosengart Declaration as Exhibit A.

27 ⁶ Instead of seeking to place her into a short-term LPS conservatorship with a higher initial burden and a statutory framework
28 that presumes the conservatee’s mental health can improve and contains stringent requirements and protections for the
conservatee, Mr. Spears placed his daughter into a long-term probate court conservatorship generally intended for those with
“dementia,” whose situations cannot or most likely will not improve, without filing a declaration of incapacity.

1 work from which he and Tri Star reaped many millions of dollars.⁷ Ms. Spears testified, and it has been
2 corroborated, that she was often forced to work against her will and was, in effect, treated like Mr.
3 Spears’s “racehorse.” It is no wonder that Anthony Palmieri, the President of the National Guardianship
4 Association, an organization representing conservators, recently expressed concern regarding the
5 arrangement. As Mr. Palmieri told *The New York Times*, “It makes me wonder where the allegiance lies.
6 Is the conservator making decisions in the best interest of the conservatee or the business manager who
7 they owe a debt to? ***It reeks of conflict of interest.***” (*Id.* at n.7.) Indeed, the California Rules of Court
8 Governing Conservators are clear. Among other things, those Rules provide that “[t]he conservator must
9 avoid actual conflicts of interest and, consistent with his or her fiduciary duty to the conservatee, the
10 appearance of conflicts of interest. . . . The conservator must avoid any personal, business, or
11 professional interest or relationship that is or reasonably could be perceived as being self-serving or
12 adverse to the best interest of the conservatee.” (See Cal. Rules of Court, Rule 7.1059, subds. (a) (2)-(4)
13 and (b).)

14 Under basic principles of conservatorship jurisprudence and fiduciary law, Mr. Spears had an
15 obligation to elevate the interests of Britney Spears above his own. The evidence demonstrates,
16 overwhelmingly, that he often did the exact opposite. And regrettably, he continues to elevate his
17 interests above those of his daughter, to whom he still owes a fiduciary duty. (See, e.g., *Kasperbauer v.*
18 *Fairfield* (2009) 171 Cal.App.4th 229, 235 [holding that even removed trustees owe ongoing fiduciary
19 duties to account for their administration]; *Conservatorship of Lefkowitz* (1996) 50 Cal.App.4th 1310,
20 1314 [“a conservator must exercise his or her powers solely in the interests of the conservatee”]; *Poag v.*
21 *Winston* (1987) 195 Cal.App.3d 1161, 1176 [“As a fiduciary, a conservator owes a duty of loyalty which
22 requires that he act in the highest good faith”]; *Hudson v. Foster* (2021) 68 Cal.App.5th 640, 662 [“The
23 essence of a fiduciary or confidential relationship is that the parties do not deal on equal terms, because
24 the person in whom trust and confidence is reposed and who accepts that trust and confidence is in a
25 superior position to exert unique influence over the dependent party” (citing *Ball v. Posey* (1986) 176
26

27 ⁷ See Liz Day, Emily Steel, Rachel Abrams, and Samantha Stark, *Britney Spears Felt Trapped. Her Business Manager*
28 *Benefited*, *The New York Times* (Dec. 19, 2021) <https://www.nytimes.com/2021/12/19/business/britney-spears-conservatorship-tri-star.html> (emphasis added), a copy of which is annexed to the Rosengart Declaration as Exhibit K.

1 Cal.App.3d 1209, 1214)]; *Richelle L. v. Roman Catholic Archbishop* (2003) 106 Cal.App.4th 257, 270
2 ["Fiduciary" and "confidential" have been used interchangeably to describe a relationship in which one
3 party has a duty to act in the highest good faith for the benefit of the other party].) Indeed, because the
4 appointment of conservators (or guardians) invades the precious rights of the person in need, they are
5 held to a necessarily high standard of conduct—"[n]ot honesty alone, but the punctilio of honor the most
6 sensitive." (See *Meinhard v. Salmon* (1928) 249 N.Y. 458, 464.) Mr. Spears must answer for his Rule
7 7.1059 violation, which significantly tainted the conservatorship from its very outset, as well as his other
8 actual or potential breaches.

9 Relatedly, as referenced above and as demonstrated in the record, although both Mr. Spears and
10 Tri Star incessantly point to the prolix "accountings"—which raise many troubling questions and are in
11 many respects extremely disjointed and incomplete—despite being fiduciaries, they have still refused
12 independently, and simply, to answer basic questions or produce all relevant information including:

- 13 • The total fees obtained from Britney Spears or her Estate between 2008-2021;
- 14 • All corporate formation documents for all entities created during the conservatorship for
15 the benefit or purported benefit of Britney Spears or her Estate;
- 16 • Tri Star's Business Management Agreement with Britney Spears or the Estate.

17 To avoid surprising him at his deposition, Mr. Spears will also be questioned about the \$6-plus
18 million he paid himself from the Estate (which were monies taken even though he was not a lawyer, a
19 business manager, or a talent manager, but was instead supposed to be a fiduciary) and whether he will
20 return them to his daughter. Additionally, as described in *The New York Times*'s extensive and
21 corroborated reporting—which was (re)corroborated by ex-FBI Special Agent Sherine Ebadi—a
22 courageous whistleblower named Alex Vlasov, who was formerly employed by the security company
23 Mr. Spears hired (Black Box Security) presented specific and credible evidence that Mr. Spears directed
24 or was involved in an intense surveillance or spying operation of his own daughter, which included
25 (i) bugging her bedroom and (ii) capturing (in real time and contemporaneously) her private
26 communications—including *sacrosanct, attorney-client privileged communications with her prior*
27 *counsel*. Did Mr. Spears disclose in the Court accountings he filed that his daughter's bedroom had been
28

1 bugged? Did he disclose in the Court accountings the interception or monitoring of his daughter's
2 communications with her lawyer? Did he disclose payments made to third parties in these regards?

3 These issues are, of course, directly relevant to several pending issues including Mr. Spears's
4 legally meritless—and morally abominable—pending petition to have his daughter pay his legal fees (on
5 top of the millions previously paid, including for his media tour). Mr. Spears further placed these acts at
6 issue during the January 19, 2021 hearing when his counsel made a number of representations concerning
7 *The New York Times*'s September 24, 2021 reporting. In response to the undersigned's reference to these
8 allegations, for example, which are directly at issue under *Shine*, Mr. Spears's counsel stated—
9 unequivocally and without reservation—that it “**DIDN'T HAPPEN, YOUR HONOR.**”⁸ As the *Times*
10 reported and an ex-FBI agent corroborated, the evidence clearly demonstrates that **it did happen.** And as
11 the following colloquy shows, Mr. Spears must account for his actions, especially (but not solely)
12 because he himself expressly placed his misconduct directly at issue, both pursuant to these
13 representations and his December 15, 2021 petition to have his daughter pay his legal fees:

14 MR. ROSENGART: MR. WEINGARTEN, IN HIS SPEECH, DIDN'T
15 SAY ONE THING ABOUT WHETHER OR NOT
16 HIS CLIENT KNEW ABOUT OR DIRECTED
17 ELECTRONIC EAVESDROPPING ON MY
18 CLIENT BOTH IN TERMS OF CAPTURING HER
19 REAL TIME COMMUNICATIONS ON HER
20 PHONE, INCLUDING COMMUNICATIONS
21 BETWEEN MS. SPEARS AND HER LAWYER,
22 AND PLACING A LISTENING DEVICE IN THE
23 BEDROOM OF MY CLIENT.

24 MR. WEINGARTEN: DIDN'T HAPPEN, YOUR HONOR.

25 ***

26 MR. ROSENGART: [MR. WEINGARTEN] SAYS IT DIDN'T HAPPEN?
27 THEN LET'S SEE WHAT MR. SPEARS SAYS
28 UNDER OATH WHEN HE IS DEPOSED.

(Rosengart Decl., Ex. B [1/19/22 Transcript at 29:20-30:6].)

⁸ Unless otherwise indicated, all bold and underlined emphases are added.

1 Additionally, in submitting his periodic accountings to the Court for review and approval, Mr.
2 Spears, at the very least, failed to disclose (and in fact apparently concealed) the spying operation at issue
3 and the payments associated with it. Under these circumstances, the recently-decided Court of Appeal
4 decision in *Hudson v. Foster* warrants a thorough review and likely the setting aside of prior accountings,
5 whether or not they were previously approved. As *Hudson* instructs, a conservatee has no duty to
6 investigate the accuracy of accountings before being alerted to information that would cause “a
7 reasonably prudent person [to] suspect wrongdoing.” (*Id.*, at pp. 648, 669-670 [“Where a conservator has
8 misrepresented a material fact in an account approved by the probate court, a party bringing a subsequent
9 action on behalf of the conservatee does not need to show that the misrepresentation could not have been
10 discovered prior to entry of the order approving the account.”].)

11 Applying *Hudson* to this case, there is specific and credible evidence that phones being utilized
12 by Ms. Spears were being contemporaneously monitored or recorded and that an illicit listening device
13 was placed her bedroom, which captured private, intimate moments and conversations. If Mr. Spears
14 concealed from the Court that he was using Ms. Spears’s money to pay Black Box Security, Tri Star, or
15 anyone else in connection with these gross invasions of privacy, such concealment would certainly be
16 material, and would constitute fraud under *Hudson*, requiring prior accountings to be set aside. (See *id.*,
17 at p. 665 [“A party may obtain relief from a judgment when the other party concealed facts in violation of
18 a duty arising from a trust or confidential relationship....”]; *id.*, at p. 667 [“When a judgment is obtained
19 through a fiduciary’s violation of the duty of disclosure to the moving party [] the moving party’s
20 reasonable reliance on the disclosures of a fiduciary is considered a satisfactory excuse for not presenting
21 a defense in a prior proceeding”].)

22 The same is true if Mr. Spears used monies from the Estate to pay for legal fees that should have
23 been absorbed by Tri Star and not Britney Spears, as set forth in the November 6, 2020 Objections and
24 confirmed during our investigation. The evidence shows, for example, that Mr. Spears improperly used
25 his daughter’s money to pay Tri Star head Lou Taylor’s legal fees in a case brought by Ms. Taylor, as a
26 Plaintiff, against a Britney Spears fan named Bryan Kuchar. (See *Lou M. Taylor v. Bryan S. Kuchar*,
27 Case 1:19-cv-03028-MLB.) Mr. Spears’s own lawyer at Holland & Knight (which itself charged the
28 Estate approximately \$540,000 for unspecified “media services”) warned him that Lou Taylor, not

1 Britney Spears, was responsible for Ms. Taylor’s personal legal fees, a proposition that should have been
2 obvious. As Holland & Knight’s Vivian Thoreen told Mr. Spears in a February 9, 2021 email:

3 ***“The Kuchar pleadings I just forwarded to you further support my conclusion that Lou***
4 ***should pay the fees of the Atlanta lawyers and more specifically, reimburse the***
5 ***conservatorship. Neither the complaint nor the answer makes any reference to***
6 ***Britney. . . no connection is made between Britney and the lawsuit. [Lou] doesn’t even***
7 ***try to weave it into the complaint, which makes the sell that the conservatorship should***
8 ***pay her fees even more tenuous.”***⁹

9 Mr. Spears is clearly concerned about his deposition. The evidence shows that his conduct
10 violated basic conservatorship jurisprudence, fiduciary law, and Rule 7.1059 of the California Rules of
11 Court governing conservators; as the Declaration of former FBI Special Agent Sherine Ebadi discusses, it
12 also implicates both state and federal criminal law. (See, e.g., Pen. Code, § 630 et seq.; 18 U.S.C. § 2511
13 et seq.; *id.*, § 2701, subd. (a).) But while understandable, the bases for his concern (which now must
14 include contradicting his own lawyer’s representations to the Court) do not excuse him from being
15 deposed; to the contrary, they compel him to be deposed.¹⁰

16 **B. Mr. Spears’s Post-Conservatorship Harassment and Bullying of His Own Daughter**

17 As a suspended conservator, Mr. Spears’s focus as a fiduciary should be cooperation and filing
18 his final accounting. Instead, his post-suspension/post-termination efforts reveal a focus on siphoning
19 more money from his daughter’s estate and incurring greater expense and fees in needless, harassing, and
20 abusive discovery. Worse, his strategy (**his diabolical strategy—against his own daughter**) is evidently
21 to cause her emotional harm and distress.¹¹ Even as Mr. Spears has failed to appear for his own
22 deposition or produce documents and information in a timely, organized, labelled, and professional
23 manner, he has purported to serve 145 document requests and more than 75 other discovery requests,
24 which are improper and irrelevant under the circumstances, while also seeking to harass and bully his

25 ⁹ See February 9, 2021 email from Vivian L. Thoreen to Jamie Spears, Re: Spears Invoice 66244-40020 and 96834-40020;
26 Declaration of Sherine Ebadi at p. 18, n.27.

27 ¹⁰ During his tenure as Conservator, Mr. Spears was also subjected to a Domestic Violence Restraining Order, resulting from
28 allegations of harassment or abuse of his own daughter’s child or children.

¹¹ This includes his or his team’s leak of his lawyer’s January 26, 2022 email that he wished to take his daughter’s deposition,
which leak included his purported interest in questioning his daughter about “child safety . . . and [possible] drug use.”

1 daughter via deposition.

2 Mr. Spears has repeatedly represented that he would (i) “**unconditionally** cooperate in
3 transferring **all** files regarding the estate to Britney’s counsel without delay,” (ii) “**unconditionally**
4 cooperate” with Ms. Spears’s undersigned counsel, and (iii) act with “*complete transparency without*
5 **conditions**.” (See November 1, 2021 “Status Report.”) Contrary to these “unconditional”
6 representations, Mr. Spears continues to hide and obstruct. Mr. Spears has failed to cooperate by
7 properly transferring “all files” in a proper, labelled, and organized manner or to answer fundamental
8 questions or produce all information concerning the above, including (i) the spying operation; (ii) his
9 approval of payments (from conservatorship funds) to third parties who were involved in or implemented
10 that spying; (iii) the total fees *and/or benefits* taken or received by Mr. Spears (or any entity in which he
11 had any interest) from Britney Spears or her estate; (iv) why Ms. Spears’s net worth was so “shockingly
12 low” relative to her gross earnings of hundreds of millions of dollars during the past decade (see *Britney*
13 *Spears’ Net Worth Revealed—And It’s Shockingly Low Compared to Her Pop Peers*, Forbes, Feb. 17,
14 2021); (v) all corporate formation documents for all entities created for the purported benefit of Britney
15 Spears or her Estate; and (vi) other economic and related questions concerning how he administered the
16 conservatorship for 13 years before his 180-degree reversal—on the heels of his suspension. And if Mr.
17 Spears has, as his counsel claims, produced all of his communications concerning the spying operation
18 (which he has *not*), he should identify them now, by Bates numbers.

19 In sum, for self-serving (and, we submit, immoral) reasons, Mr. Spears appears intent on
20 harassing and bullying his daughter, while stonewalling and obfuscating the facts. This must stop. After
21 entering the case, we invited him to voluntarily resign his position as conservator. He refused and the
22 Court suspended him. We now invite him to change the course he is on. We hope he accepts and does
23 what is right, both legally and morally.

24 **C. The Present Dispute—Mr. Spears’s Refusal to Appear for Deposition**

25 On October 1, 2021, Mr. Spears’s deposition was noticed for October 20, 2021, at Greenberg
26 Traurig in Los Angeles, California; the Notice required that documents be produced at the deposition.
27 (Rosengart Decl., Ex. C.) The document requests called for the production of “All DOCUMENTS and
28 COMMUNICATIONS RELATING TO the electronic surveillance” of Britney Spears, including but not

1 limited to “All DOCUMENTS and COMMUNICATIONS RELATING TO any recording or listening
2 device in the home or bedroom of” Britney Spears. (*Id.*)

3 Mr. Spears did not object to the Deposition Notice or accompanying document requests. Instead,
4 by email dated October 13, 2021, his former counsel advised that “Jamie is in the process of hiring new
5 counsel” and that she was “not available” to defend Mr. Spears on October 20th. (*Id.*, ¶ 4, Ex. D.)
6 Counsel for Ms. Spears granted the courtesy of rescheduling the deposition, based upon the
7 understanding that Mr. Spears would abide by his obligation to submit to a deposition while also making
8 it clear that the “notice of deposition remains in effect.” (*Id.*) Specifically, we wrote:

9 We can discuss the deposition date, although . . . Mr. Spears already has at
10 least two other lawyers from the Freeman law firm (Geraldine Wyle and
11 Jerry Cohen), who have been on this matter for numerous years and it is
unclear why you (or at least they) cannot timely produce the documents and
respond to discovery, especially given the initial extension [of time].

12 I was happy to extend the professional courtesy but, candidly, after many
13 years, with the discovery due this week, and the hearing set for next month,
14 this seems like a way for your client Mr. Spears to seek to create further
delay.

15 (*Id.*, Ex. D.) Unfortunately, this initial delay was just the beginning.

16 After Mr. Spears represented in his November 1, 2021 Court filing that he would
17 “unconditionally cooperate” with the undersigned counsel and would act with “complete transparency
18 without conditions,” Mr. Spears’s deposition was noticed for November 10, 2021. (Rosengart Decl., Ex.
19 E.) Again, Mr. Spears inexcusably failed to appear for his deposition. (Rosengart Decl., ¶ 5.)

20 Given Mr. Spears’s failure to cooperate and his ongoing efforts to avoid his deposition, on March
21 2, 2022, a Second Amended Notice of Deposition was served, providing more than one month’s advance
22 notice for the deposition, which was set for April 6, 2022 (the “Second Amended Notice”). (Rosengart
23 Decl., Ex. F.) The Second Amended Notice was served with a cover letter advising that if the noticed
24 date of April 6, 2022 was not available, we would be “amenable to rescheduling the deposition [date] in
25 early April.” (Rosengart Decl., ¶ 6.) Mr. Spears did not provide any such alternative date in early April.
26 Instead, on April 1, 2022, he baldly objected to the Second Amended Notice. (Rosengart Decl., ¶ 7.) He
27 advised that he would not appear and for the very first time after more than five months of delay claimed
28

1 the deposition could not occur in Los Angeles because he resided in Kentwood, Louisiana. (*Id.*)

2 On April 25, 2022, counsel for Britney Spears sent another letter to Mr. Spears’s counsel
3 explaining that Ms. Spears had been seeking to take Mr. Spears’s deposition since October 2021, and that
4 despite his claims that he would “unconditionally cooperate” and provide “complete transparency
5 without conditions,” Mr. Spears had continually failed to appear and also failed to provide *any* alternate
6 dates for his deposition. (Rosengart Decl., ¶¶ 6, 10.) Accordingly, as another accommodation to Mr.
7 Spears, we proposed no less than *eight* possible dates for Mr. Spears’s deposition: **June 3, 7, 8, 9, 10,**
8 **14, 15, or 16.** Each of those proposed dates was well over one month away, giving Mr. Spears ample
9 time to prepare, on top of the prior six-months. We also advised that although “Los Angeles is the most
10 convenient and efficient location,” we would take the deposition in Louisiana. (*Id.*, Ex. G.)

11 As of May 2, 2022, Mr. Spears’s counsel had failed to respond to the above. Accordingly, on that
12 same day, the undersigned sought to confirm a date for his client’s deposition, reminding him again of his
13 previously-promised “unconditional cooperation,” asking for confirmation of one of the above-referenced
14 dates, and informing him that we would be willing “take the deposition in Louisiana, or any city in the
15 country with a suitable facility.” (Rosengart Decl., Ex. H.) Counsel for Mr. Spears responded on May 4,
16 2022, but rather than agreeing to any of the eight proposed deposition dates—and despite his promises of
17 “unconditional cooperation”—he conditioned producing Mr. Spears for deposition on the undertaking of
18 discovery *from* Britney Spears (after effectively seeking a *quid pro quo* exchange of his deposition for his
19 daughter’s).

20 In short, not only has Mr. Spears been hiding; now, he is hiding behind his own daughter. It was
21 reasonable to hope that after the exposure of the conflicted, abusive, and potentially criminal manner in
22 which he ran the conservatorship, Mr. Spears would, at last, cooperate with his discovery obligations,
23 even if he failed to show his own daughter a measure of grace and decency. Regrettably, however, Mr.
24 Spears’s pattern of cruelty and bullying continues.

1 **III. LEGAL DISCUSSION**

2 **A. An Order Compelling Mr. Spears’s Deposition Is Necessary to Put an End to His**
3 **Dilatory Tactics and Gamesmanship**

4 The initial Deposition Notice alone was sufficient to compel Mr. Spears’s attendance, and Mr.
5 Spears had, and has, no valid legal grounds on which to refuse to appear for his deposition. (Code Civ.
6 Proc., § 2025.280 “[t]he service of a deposition notice under Section 2025.240 is effective to require any
7 deponent who is a party to the action . . . to attend and to testify”).) Section 2025.450 of the Code of
8 Civil Procedure provides that a court may issue an order compelling the appearance of a party for
9 deposition if, after service of a deposition notice, the party fails to appear for a deposition without having
10 served a valid objection under Section 2025.410 of the Code of Civil Procedure. (*Id.*, § 2025.450, subd.
11 (a).) Moreover, Courts generally will issue orders that depositions be conducted and completed in the
12 order noticed. (Weil & Brown, Cal. Practice Guide: Civil Procedure Before Trial (The Rutter Group
13 2008) ¶ 8:497 [“Even in the absence of statutory authority or rule, many judges will order depositions to
14 be taken and completed in the order noticed.”]; see also Code Civ. Proc., § 2019.020, subd. (a).)

15 There is no basis for Mr. Spears’s continuous efforts to flout these basic rules. (See Code Civ.
16 Proc., § 2025.450(a) [court may grant motion to compel against a party who fails to appear for deposition
17 without valid objection].) This is particularly true given the numerous opportunities with which he was
18 provided to comply with his obligation to appear. (See Cal. Code Civ. Proc., § 2025.420.) For each of
19 these reasons, good cause exists to order Mr. Spears to comply with his obligation to appear for his
20 deposition forthwith.¹²

21
22
23 ¹² Mr. Spears’s belated claim, that he is somehow absolved of his obligation to sit for deposition until he obtains discovery,
24 fails. It is another delay tactic. During the meet-and-confer process, Mr. Spears contended that *Perlan Therapeutics, Inc. v.*
25 *Superior Court* (2009) 178 Cal.App.4th 1333, 1353 and *Kayne v. The Grand Holdings Ltd.* (2011) 198 Cal.App.4th 1470,
26 1473 support his position. Not so. *Perlan* is inapplicable because it is premised on Code of Civil Procedure section 2019.210,
27 which requires that a plaintiff suing for misappropriation of trade secrets identify those trade secrets with “reasonable
28 particularity” before commencing discovery relating to them. The identification of trade secrets is not at issue here.
 Accordingly, Code of Civil Procedure section 2019.210 does not apply, thus rendering *Perlan Therapeutics, Inc. v. Superior*
 Court inapplicable. *Kayne v. The Grande Holdings Limited* (2011) 198 Cal.App.4th 1470 is also inapplicable. In *Kayne*, the
 parties had a discovery dispute regarding document production and reached an agreement regarding the scope and timing of
 that document production. (198 Cal.App.4th at p. 1472.) Thereafter, the producing party produced documents late and in
 disarray, which the requesting party argued was in violation of Code of Civil Procedure section 2031.280. (*Id.*, at pp. 1472-
 1473.) *Kayne* did not involve one party bartering his deposition for documents or his adversary’s deposition.

1 **B. Mr. Spears's Objection to the Location of the Deposition is Meritless and Moot**

2 After six months of delay, Mr. Spears recently objected to the date and location of the deposition
3 noticed in the Second Amended Notice of Deposition. His objections are meritless.

4 Regarding the date of the deposition, Mr. Spears objected that the deposition was “unilaterally
5 noticed” without inquiring as to his availability, Rosengart Decl., ¶ 7, but the Code contains no such
6 requirement. (See Code Civ. Proc., § 2025.280.) Moreover, the cover letter accompanying the April 6
7 Notice offered to accommodate other potential dates, providing that if “you or your client have actual
8 conflicts on that day, we will be amenable to rescheduling the deposition in early April.” (*Id.*, ¶ 6.) Mr.
9 Spears and his counsel ignored that invitation. Further, Ms. Spears had already twice amended the date
10 of the deposition to try to accommodate Mr. Spears and his counsel, while continuing to provide Mr.
11 Spears's counsel with alternative dates. (See, e.g., Rosengart Decl., ¶¶ 4-6, 8.) Most recently, by letter
12 dated April 25, we provided no less than eight dates, with more than one month's advance notice for the
13 deposition. Mr. Spears and his counsel also ignored this overture.

14 Regarding the location of the deposition, Mr. Spears objected to the Second Amended Notice of
15 Deposition because he lives in Kentwood, Louisiana. (Rosengart Decl., ¶ 7.) This objection does not
16 have merit. *First*, any objection regarding the location of the deposition was waived. The first two
17 deposition notices set the deposition location in Los Angeles. Los Angeles is the most logical location
18 for the deposition because it is where Ms. Spears, the Court, and counsel for the parties reside. It is also
19 where many of the relevant acts occurred. Moreover, Mr. Spears did not initially object to this location.
20 If Mr. Spears had an objection to the deposition taking place in Los Angeles, it was incumbent upon him
21 to object on that basis at least three days before the originally-noticed October 20, 2021 date. (See Code
22 Civ. Proc., § 2025.410 [“Any party served with a deposition notice that does not comply with Article 2
23 (commencing with Section 2025.210) waives any error or irregularity unless that party promptly serves a
24 written objection specifying that error or irregularity at least three calendar days prior to the date for
25 which the deposition is scheduled, on the party seeking to take the deposition and any other attorney or
26 party on whom the deposition notice was served.”]; see also *Parker v. Wolters Kluwer United States, Inc.*
27 (2007) 149 Cal.App.4th 285, 295 [discussing deponent's waiver].)

28 *Second*, any objection regarding the deposition's location is now moot because although Los

1 Angeles is the most logical and convenient location for the deposition, Ms. Spears's counsel has already
2 advised Mr. Spears's counsel that he will take the deposition "*in any city in the country.*" (Rosengart
3 Decl., Ex. G.) Still, Mr. Spears continues to run and hide.¹³

4 * * *

5 Because it is impossible to sum up in one paragraph, or even in a full motion, the myriad reasons
6 Mr. Spears can no longer avoid answering for his deeds, we conclude simply with this: since childhood
7 and certainly over the past decade, Britney Spears has been forced to live under her father's thumb, even
8 as she gave him an identity and supported him financially; yet he has never been required to answer for
9 his conduct, including his gross, self-interested misuse of his fiduciary position. For Mr. Spears to
10 contend that he will answer for his actions if (and only if) his daughter's personal, private life is further
11 exposed demonstrates just how misguided he is as a fiduciary and as a father. Enough is enough.
12 Britney Spears will tolerate it no longer, and with respect, neither should this Court.

13 Finally, we once again ask and implore, in all sincerity, that Mr. Spears and his counsel do what is
14 right, voluntarily. Be decent. Please, stop harassing and bullying your daughter. Please, leave your
15 daughter alone. To once again quote attorney Joseph N. Welch, "*You've done enough. Have you no*
16 *sense of decency, sir, at long last?*"

17 **IV. CONCLUSION**

18 For all of the foregoing reasons, an Order should be issued compelling Mr. Spears to appear for
19 his deposition.

20 Dated: May 25, 2022

Respectfully Submitted,

21 GREENBERG TRAURIG, LLP

22
23 By: /s/ Mathew S. Rosengart
24 Attorneys for Britney Jean Spears

25
26 ¹³ Although not part of this application as a matter of restraint, Ms. Spears reserves the right to seek sanctions, if necessary.
27 Where a party refuses to appear in response to repeated deposition notices, the party noticing the deposition may bring a
28 motion to compel and, if successful, sanctions are mandatory unless the deponent "acted with substantial justification or that
other circumstances make the imposition of the sanction unjust." (Code Civ. Proc., § 2025.450; see also *Snyder v. Superior
Court of Los Angeles Cty.* (1970) 9 Cal.App.3d 579, 585-587.) There is no such "substantial justification" or unjust
circumstance here.